Chemical Industry Sector

Guide to South Carolina Environmental Regulations

May 2004

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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PROMOTE PROTECT PROSPER
South Carolina Department of Health and Environmental Control

UNIVERSITY OF SOUTH CAROLINA
INSTITUTE FOR PUBLIC SERVICE AND POLICY RESEARCH
COLLEGE OF LIBERAL ARTS

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Introduction

It is important for everyone to comply with environmental regulations in order to protect the health of both humans and the natural resources that we all depend on. Another reason to comply with environmental regulations is to avoid potentially costly penalties associated with non-compliance. Environmental regulations may seem confusing and daunting but having a proper understanding of them and how your business affects the environment may actually allow you to save money and be more productive. For example, best management practices (BMPs) will make environmental compliance easier and less costly. Pollution Prevention (P2) is another way to increase compliance while reducing costs. It involves replacing toxic or hazardous products with environment and employee friendly materials, equipment and process modifications to reduce the generation of waste, and improved operations and maintenance (including employee training).

This environmental compliance assistance guide is a step-by-step self audit checklist to compliance with South Carolina's laws and regulations on waste disposal, underground storage tanks, wastewater, storm water, and air pollution. This guide has been developed with the small business in mind. We have tried to make it clear and concise but with enough detail so that many or most of your questions will be answered right here. However, if you need more help please contact the appropriate SC DHEC Bureau. Contact numbers for these are provided in the next section. Another option is to contact either the Small Business Assistance Program (1-800-819-9001) or the Center for Waste Minimization (803-896-8986).

Further Sources of Information

DHEC General Contact:
2600 Bull Street
Columbia, SC 29201
(803) 898-3432

Air Quality
-Bureau of Air Quality (BAQ)…….……..…… (803) 898-4123
Online: http://www.scdhec.net/baq/
-Air Quality Fact Sheets: http://www.scdhec.gov/eqc/baq/html/baq_facts.html#
-Plain English Guide to the Clean Air Act (EPA-400-K-93-001):
http://www.epa.gov/oar/oaqps/peg_caa/pegcaain.html
-EPA List of Air Pollutants: http://www.epa.gov/ebtpages/airairpollutants.html

Solid and Hazardous Waste
-Bureau of Land and Waste Management (BLWM)…….……...… (803) 896-4001
Online: http://www.scdhec.net/lwm/
-EPA's toll-free RCRA/Superfund Hotline…….....… (800) 424-9346
-Guide for Industrial Waste Management:
http://www.epa.gov/epaoswer/non-hw/industd/index.htm
-EPA National Waste Minimization Program: http://www.epa.gov/wastemin/

Storm Water and Wastewater
-Bureau of Water (BOW)……...… (803) 898-4215
Online: http://www.scdhec.net/water/
-NPDES Overview for Industrial and Commercial Facilities:
http://cfpub.epa.gov/npdes/home.cfm?program_id=14
-Guidance Manual for Conditional Exclusion from Storm Water Permitting Based On "No Exposure" of Industrial Activities to Storm Water (EPA 833-B-00-001):
http://www.scdhec.net/eqc/water/pubs/noxguide.pdf
-National Menu of Best Management Practices for Storm Water Phase II:
http://cfpub.epa.gov/npdes/stormwater/menuofbmps/menu.cfm
- Summary Guidance for Developing Pollution Prevention Plans and Best Management Plans for Industrial Activities (EPA 833-R-92-002)
-EPA Storm Water Program (lots of fact sheets in the publication section):
http://cfpub.epa.gov/npdes/home.cfm?program_id=6

Underground Storage Tanks
-SC DHEC, Underground Storage Tanks (Help Line, Assistance and Leak Reporting)
(803) 896-6240 or toll free (800) 826-5435 (in SC only)
Online: http://www.scdhec.net/ust/
-EPA, A Basic Checklist for USTs: http://epa.gov/swerust1/cmplastc/cheklist.htm
-EPA UST FAQs: http://www.epa.gov/swerust1/faqs/index.htm
-Operating and Maintaining Underground Storage Tank Systems: Practical Help and Checklists: http://www.epa.gov/swerust1/pubs/ommanual.htm
-Musts for USTs: A Summary of the Federal Regulations for Underground Storage Tank Systems: http://www.epa.gov/swerust1/pubs/musts.htm

Other Resources

-Center for Waste Minimization…………………………………………….…… (803) 896-8986

Online: http://www.scdhec.net/eqc/admin/html/wastemin.html

-Small Business Assistance Program (SBAP)……………………….……...… (800) 819-9001

Online: http://www.scdhec.net/eqc/admin/html/sbap.asp

-SC DHEC Online Forms: http://www.scdhec.net/eqc/admin/html/eqforms.html

-The EPA's Practical Guide to Environmental Management for Small Businesses (EPA233-K-02-001)

NOTE: EPA Publications can be obtained in several different ways. The first is to go to EPA's website at http://www.epa.gov/swerust1/pubs/index.htm to order, read, or download documents online. You can also write and ask for free publications by addressing your request to EPA's publication distributor: National Service Center for Environmental Publications (NSCEP), Box 42419, Cincinnati, OH 45242. You may also contact EPA's publication distributor's toll-free number at (800) 490-9198 or fax (513) 489-8695.

DHEC Environmental Quality Control District Offices

If you would like to contact someone locally, DHEC Environmental Quality Control District Offices would be a good place to start.

Appalachia I
Anderson, Oconee…….……..…. (864) 260-5569

Appalachia II
Greenville, Pickens…….. (864) 241-1090

Appalachia III
Cherokee, Union, Spartanburg…….…… (864) 596-3800

Catawba
Chester, Lancaster, York……..…….…… (803) 285-7461

Central Midlands
Fairfield, Lexington, Newberry, Richland……...…. (803) 896-0620

Edisto Savannah
Aiken, Allendale, Bamberg, Barnwell, Calhoun, Orangeburg……..… (803) 641-7670

Low Country
Beaufort, Colleton, Hampton, Jasper……...…….…. (843) 522-9097

Pee Dee
Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro …….. (843) 661-4825

Trident
Berkeley, Charleston, Dorchester……...……. (843) 740-1590

Upper Savannah
Abbeville, Edgefield, Greenwood, Laurens, McCormick, Saluda…… (864) 223-0333

Waccamaw
Georgetown, Horry, Williamsburg……...……. (843) 448-1902

Wateree
Clarendon, Kershaw, Lee, Sumter……...…..…. (803) 778-1531

List of Commonly Used Acronyms

Acronym	Term
112(r)	accidental release prevention requirement section of the Clean Air Act
ARAR	Applicable or Relevant and Appropriate Requirements
AST	Above Ground Storage Tank
BACT	Best Available Control Technology
BAQ	Bureau of Air Quality (DHEC)
BDAT	Best Demonstrated Available (or Achievable) Technology
BIFs	Boilers and Industrial Furnaces
BLWM	Bureau of Land & Waste management (DHEC)
BMP	Best Management Practices
BMR	Baseline Monitoring Report
BOD	Biochemical Oxygen Demand
BOW	Bureau of Water (DHEC)
BRAP	Business Recycling Assistance Program
C&D	Construction and Demolition
CAA	Clean Air Act
CAMEO	Computer-Aided Management Of Emergency Operations
CAS	Chemical Abstracts Service
CBEP	Community Based Environmental Protection
CBI	Confidential Business Information
CEMS	Continuous Emission Monitoring System
CEPPO	Chemical Emergency Preparedness and Prevention Office
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESQG	Conditionally Exempt Small Quantity Generator
CFC	Chlorofluorocarbons
CFR	Code of Federal Regulations
CIB	Chemical Industry Branch
CMA	Chemical Manufacturer's Association
COE	U.S. Army Corps of Engineers
CWA	Clean Water Act
CWM	Center for Waste Minimization (DHEC)
DHEC	Department of Health & Environmental Control
DMR	Discharge Monitoring Report
DOC	Department of Commerce
DOT	Department of Transportation
E2SC	Environmental Excellence in South Carolina
EHS	Extremely Hazardous Substance (list of 356 chemicals)
ELG	Effluent Limitation Guidelines
EMD	Emergency Management Division
EMS	Environmental Management System
EPA	US Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act of 1986
EQC	Environmental Quality Control
ERT	Emergency Response Team (DHEC)
ESA	Endangered Species Act
FEP	Federal, Energy & Pretreatment (Permitting Section)
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FMEA	Failure Mode and Effects Analysis
FORM R	document used to report annual releases of certain chemicals (list of 650 chemicals)
FR	Federal Register
FRP	Fiberglass-Reinforced Plastic
FTA	Fault Tree Analysis
FWPCA	Federal Water Pollution Control Act
GIS	Geographic Information System
GPO	U.S. Government Printing Office
GWPD	Ground-Water Protection Division
HAP	Hazardous Air Pollutant
HAZOP	HAZard and OPerability study
HAZWOPER	HAZardous Waste OPerations and Emergency Response (29 CFR part 120)
HCS	Hazard Communication Standard
HHW	Household Hazardous Waste
HMTA	Hazardous Materials Transportation Act
HSWA	Hazardous and Solid Waste Amendments of 1984
ICP	Integrated Contingency Plan
LAER	Lowest Achievable Emission Rate
LDRs	Land Disposal Restrictions
LEPC	Local Emergency Planning Committee
LERC	Local Emergency Response Commission
LFL	Lower Flammability Limit
LQG	Large Quantity Generator
MACT	Maximum Achievable Control Technology
MCL	Maximum Contaminant Level
MCLG	Maximum Contaminant Level Goal

Acronym	Term
MGD	Million Gallons per Day
MOC	Management Of Change
MS4	Municipal Separate Storm Sewer System
MSDS	Material Safety Data Sheet
MSW	Municipal Solid Waste
NAAQS	National Ambient Air Quality Standard
NACD	National Association of Chemical Distributors
NAICS	North American Industry Classification System
NCP	National Contingency Plan
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NFPA	National Fire Protection Association
NPDES	National Pollution Discharge Elimination System
NPL	National Priorities List
NPS	Non Point Source
NRC	National Response Center
NRT	National Response Team
NSPS	New Source Performance Standards
O&M	Operations & Maintenance
OCA	Offsite Consequence Analysis
OCRM	Ocean and Coastal Resource Management
OECA	Office of Enforcement and Compliance Assurance
OEPPR	Office of Emergency Prevention, Preparedness and Response
OP	Operating Permit
OPPTS	Office of Pollution Prevention and Toxic Substances
OSHA	Occupational Safety and Health Act
OSHA	Occupational Safety and Health Administration
OSW	EPA Office of Solid Waste
OSWER	EPA Office of Solid Waste and Emergency Response
P&IDs	Piping and Instrumentation Diagrams
P.E.	Professional Engineer
P2	Pollution Prevention
P3	Pollution Prevention Plan
PA/SI	Preliminary Assessment and Site Inspection
PCA	Pollution Control Act of South Carolina
PER	Preliminary Engineering Report
PFD	Process Flow Diagrams
PHA	Process Hazard Analysis
PM 10	Particulate Matter (diameter of 10 micrometers or less)
PM 2.5	Particulate Matter (diameter of 2.5 micrometers or less)
POTW	Publicly Owned Treatment Work
PPA	Pollution Prevention Act
PRP	Potentially Responsible Party
PS	Point Source
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
PSM	Process Safety Management (29 CFR 1910.119)
QC	Quality Control
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation/Feasibility Study
RMP	Risk Management Plan
RMP	Risk Management Program
RMP *comp*	software program used to calculate the approximate area a chemical release might impact
RMP *SUBMIT*	Software program used to summarize a facilities Risk Management program
ROD	Record of Decision
RQ	Reportable Quantity
SARA	Superfund Amendments and Reauthorization Act
SBAP	Small Business Assistance Program (DHEC)
SC DHEC	South Carolina Department of Health & Environmental Control
SCHWMR	South Carolina Hazardous Waste Management Regulations
SCUSTCR	South Carolina Underground Storage Tank Control Regulations
SDWA	Safe Drinking Water Act
SEP	Supplemental Environmental Projects
SERC	State Emergency Response Commission
SIC	Standard Industrial Classification
SOCMA	Synthetic Organic Chemical Manufacturers Association
SOP	Standard Operating Procedures
SPCC	Spill Prevention, Control, and Countermeasures (40 CFR part 112)
SQG	Small Quantity Generator
STP	Sewage Treatment Plant OR Standard Temperature and Pressure
SUPERB	State Underground Petroleum Environmental Response Bank
SW	Storm Water
SWDA	Solid Waste Disposal Act

Acronym	Term
SWIX	Southern Waste Information eXchange
SWMU	Solid Waste Management Unit
TCLP	Toxicity Characteristic Leaching Procedure
TIER II	Document used to report annual chemical inventories at a facility
TIER II *SUBMIT*	Software program to generate a Tier II document
TMDL	Total Maximum Daily Load
TPQ	Threshold Planning Quantity
TPY	Tons Per Year
TQ	Threshold Quantity
TRI	Toxic (Chemical) Release Inventory
TRI-ME	Toxic Chemical Release Inventory Made Easy, software program used to generate a FORM R document
TSCA	Toxic Substance Control Act
TSDF	Treatment, Storage, and Disposal Facility
TSDR	Treatment, Storage, Disposal, and Recycling (Facility)
TSP	Total Suspended Particulates
TSS	Total Suspended Solids
U.S.C.	United States Code
UIC	Underground Injection Control
UST	Underground Storage Tank
VOC	Volatile Organic Compound
WTP	Water Treatment Plant
WV	Weighted Value
WWTP	Waste Water Treatment Plant

A: Water

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South Carolina Department of Health and Environmental Control

Wastewater Regulatory Requirements

Wastewater discharges are regulated by DHEC's Bureau of Water (BOW). Wastewater discharges from chemical industries include sanitary wastewater from bathrooms and sinks and process wastewaters from floor cleaning, equipment cleaning, and other sources. How wastewater discharges from your facility are regulated is dependent upon whether the wastewater is being discharged to:

-a municipal wastewater treatment plant,
-a septic system,
-the surface of the ground or surface waters.

How discharges are regulated also depends on the volume of the discharge and whether it is sanitary wastewater, process wastewater (e.g. from floor drains, etc.) or a combination of both sanitary and process wastewater.

Discharges to Municipal Sewer Systems

Facilities that discharge non-sanitary wastewater (e.g. floor drain wastewater, spent aqueous parts cleaning solutions, or etc.) to a wastewater treatment plant should notify the Bureau of Water and the local treatment facility to obtain written approval for the discharge. This allows the wastewater treatment plant to verify that the contaminants in your wastewater are compatible with their system and can be adequately treated there. The wastewater treatment plant may be able to accept your wastewater as it is but it is also possible that your wastewater will need to be pretreated. If a pretreatment permit is issued by the municipality, then a DHEC wastewater construction permit may be required for any treatment system that needs to be built to meet the limitations set by the sewer authority, including simple systems such as an oil/water separator. Prior to operating any wastewater pretreatment system, operational approval must be granted by the local DHEC EQC office. If pretreatment is not required and the sewer authority grants permission for the discharge, you may still need a construction permit and operating approval from DHEC for the sewer line connecting the discharge to the sewer lines already in existence. Hazardous materials, such as parts cleaning solvents, oils, or painting wastes are generally prohibited from being discharged to the sewer.

Pump and Haul

If the wastewater treatment facility can't or won't accept your wastewater then you may choose to manage it another way such as containerization using pump and haul. Using this method, you will locate a suitable disposal facility, whether it is a municipal, industrial, or other centralized waste treatment facility, and obtain their approval to accept your wastewater. Pumping and hauling of wastewater may also require approval from the Bureau of Water depending on the volume and frequency of disposal.

Septic System

If a municipal sewer is not available, a septic system may be considered for your wastewater discharges. Septic tanks should really only be used for sanitary wastewater. You may contact the local Environmental Quality Control office of your county for assistance (see page 4 for a listing of DHEC's District Offices). If the discharged wastewater includes process wastewater, the county environmental health office will work along with the Bureau of Water to determine the appropriate permit needs for your location. You may be asked to consider a different method of wastewater disposal such as containerization or pump and haul methods.

Although it may be possible for a business to obtain a permit to discharge process wastewater on-site under limited circumstances, the potential liability of such a practice should be given serious consideration. If nearby persons depend on groundwater for drinking, there is the potential for contamination of a well. The Department strongly discourages the combination of domestic and non-domestic discharges to on-site subsurface disposal systems. In any event, approval must be obtained from DHEC prior to the discharge of non-domestic wastewater to an on-site subsurface disposal system.

Discharges of Wastewater to the Ground or Surface Water

Discharges of wastewaters to either the ground or to surface waters require a permit from the Bureau of Water. Discharges to the ground may be in the form of discharges to a pond or wastewater lagoon or land application of the wastewaters by spraying them onto the ground surface via an irrigation system or mobile method. In these situations, the Department is concerned with the potential impacts to the groundwater quality near these sites and limiting runoff from these sites. A land application or no discharge (ND) permit may be issued for these types of wastewater disposal with limitations designed to protect the groundwater.

Discharges to surface waters, including storm drains that discharge to surface waters, require an NPDES permit. This permit will contain limitations to protect both human health and aquatic life based on the nature of the discharges, whether sanitary or process or a combination of discharges, the size of the stream to which the discharge flows, and various other factors. If another suitable means of wastewater disposal is available, such as those discussed above, an NPDES permit may not be granted to a discharger.

In either the ground or surface water disposal methods, quite often a treatment system is needed to meet the limitations set in the permit. A wastewater construction permit and operating approval must be obtained prior to placing a system or any modifications to an existing system into operation.

NPDES Wastewater Checklist

If you answer *Yes* or *NA (non applicable)* to **all** of the questions in this section then you are on the right track to being in compliance. However, if you answer *No* to **any** of the questions you may not be complying with all of the requirements under South Carolina and Federal Environmental Laws and Regulations. If you need help determining how to come into compliance, there is a list of additional information and bureau contacts at the beginning of this book.

1. We are aware of what processes in our facility generate wastewater. ❑ Yes/NA ❑ No

2. We know where our wastewater is discharged (e.g., released to public sewer, septic tank/tile field, storm drain, pump and haul, etc.). ❑ Yes/NA ❑ No

3. We have identified all of the floor drains in our facility and know where they discharge to. (Floor drains that are not connected to a permitted wastewater treatment plant are prohibited.) ❑ Yes/NA ❑ No

4. We do not dispose of any hazardous materials through our sinks or drains. ❑ Yes/NA ❑ No

5. Our facility's wastewater discharges to a public sewer and we have received approval from DHEC and the local sewer authority for the discharge. If required, we pretreat our wastewater and have met all the requirements of doing so (e.g., an industrial pretreatment permit, a DHEC wastewater construction permit and operating approval and proper sludge disposal methods).
   OR
   Our facility's wastewater is containerized and/or pumped and hauled to remove it from our facility. We have met all requirements that may be associated with transporting our wastewater.
   OR
   We use another method to dispose of wastewater and have checked with our regulatory agency for the appropriateness of this method and any permitting needs associated with it. ❑ Yes/NA ❑ No

6. We discharge sanitary wastewater (domestic wastewater) to an on-site subsurface system (i.e. septic system) and have received a septic tank permit from DHEC's Environmental Health Office. ❑ Yes/NA ❑ No

7. We use a DHEC approved lab for any required sampling. ❑ Yes/NA ❑ No

8. We maintain all required records on-site. ❑ Yes/NA ❑ No

Storm Water Regulatory Requirements

Activities that take place at industrial facilities, such as material handling and storage, are often exposed to storm water. The runoff from these activities discharges industrial pollutants into nearby storm sewer systems and water bodies. This may adversely impact water quality.

To limit pollutants in storm water discharges from industrial facilities, the National Pollutant Discharge Elimination System (NPDES) Storm Water Program includes an industrial storm water permitting component. Operators of industrial facilities that have storm water discharges associated with industrial activity that discharge storm water to a municipal separate storm sewer system (MS4) or directly to waters of the United States require authorization under a NPDES industrial storm water permit. Chemical and allied product manufacturers are deemed to have storm water discharges associated with their activities and NPDES permits are required for such discharges.

In some cases, a facility operator may be eligible for a conditional/temporary exclusion from permitting requirements. Otherwise, the facility operator must determine if the facility is eligible for coverage under a general or an individual NPDES industrial storm water permit. Most industrial facilities have permit coverage under a general permit because it is the most efficient permit option. General permits contain requirements for numerous types of industrial activities, allowing a facility operator to quickly obtain permit coverage. However, there are certain circumstances where a general permit is either not available or not applicable to a specific facility. In this type of situation, a facility operator must obtain coverage under an individual permit that the NPDES permitting authority will develop with requirements specific to the facility.

NPDES Storm Water Checklist

The storm water checklist is based on whether or not you have any materials or activities exposed to precipitation that require permitting. If you know whether or not you qualify for no exposure exemption, then please proceed to the appropriate checklist: *No Exposure, General Permit,* and *Individual Permit.* If you do not know what your status is, then please complete the exposure status checklist first. (You may also find the EPA definition of no exposure at the end of this section to be of use.) Follow the directions at the end of the exposure status checklist to determine if you should then complete the *No Exposure, General Permit,* and *Individual Permit* checklist.

In the *No Exposure, General Permit,* and *Individual Permit* sections, if you answer *Yes* or *NA (non applicable)* to **all** of the questions then you are on the right track to being in compliance. However, if you answer *No* to **any** of the questions you may not be complying with all of the requirements under South Carolina and Federal Environmental Laws and Regulations. If you need help determining how to come into compliance, there is a list of additional information and Bureau contacts at the beginning of this book.

NPDES Storm Water Checklist: Exposure Status

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?

1. Using, storing, or cleaning industrial machinery equipment, and areas where residuals from using, storing or cleaning industrial equipment remain and are exposed to storm water. ❑ Yes/NA ❑ No
2. Materials or residues on the ground or in storm water inlets from spills/leaks. ❑ Yes/NA ❑ No
3. Materials or products from past industrial activity. ❑ Yes/NA ❑ No
4. Material handling equipment (except adequately maintained vehicles). ❑ Yes/NA ❑ No
5. Materials or products during loading/unloading or transporting activities. ❑ Yes/NA ❑ No
6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants). ❑ Yes/NA ❑ No
7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers. ❑ Yes/NA ❑ No
8. Materials or products handled/stored on roads or railways owned or maintained by the discharger. ❑ Yes/NA ❑ No
9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters]). ❑ Yes/NA ❑ No
10. Application or disposal of process wastewater (unless otherwise permitted). ❑ Yes/NA ❑ No
11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow. ❑ Yes/NA ❑ No

If you answered *No* to **every** question in this section then please proceed to the *No Exposure Certification* checklist. If you answered *Yes* to **any** of the questions in this section you are **not** eligible for the no exposure certification. Please proceed to the *General Permit* checklist.

NPDES Storm Water Checklist: No Exposure Certification

1. We have NO industrial materials (raw, finished, waste materials, and by-products) or industrial-material handling equipment exposed to storm water on any part of our facility's property. (If you answer "No" then you need to be using either the General Permit or the Individual Permit Checklist). ❑ Yes/NA ❑ No

2. We have filed a *No Exposure Certification for Exclusion from NPDES Storm Water Permitting Form* and the associated fee of $350. ❑ Yes/NA ❑ No

3. We complete the Certification and submit it to our permitting authority once every 5 years along with the fee of $350. We note the date when we file so that we know when we need to renew our certificate (assuming that the condition of no-exposure continues to exist). ❑ Yes/NA ❑ No

4. We submit a Certification for each separate facility or site we have that qualifies for the no exposure exclusion. ❑ Yes/NA ❑ No

5. If any changes at our facility resulted in industrial activities or materials becoming exposed we understand that our no exposure condition ceases to be valid and we apply for coverage under an applicable NPDES permit for storm water discharges at least two days before the changes happen that cause the condition of exposure. ❑ Yes/NA ❑ No

6. We understand that the no exposure certification form is non-transferable and that if we took over a facility that we, as the new operators, must immediately complete and submit a new form to claim the no exposure exclusion before beginning operations. (If new operators fail to do this, the permitting authority will assume that the facility is required to be covered under a storm water discharge permit.) ❑ Yes/NA ❑ No

7. We have submitted a copy our completed certification to our Municipal Separate Storm Sewer System (MS4) operator if they so request or require. ❑ Yes/NA ❑ No

NPDES Storm Water Checklist: General Permit

1. We have industrial materials (raw, finished, waste materials, and by-products) or industrial-material handling equipment exposed to storm water and we have filed a *Storm Water Notice of Intent (NOI) For Storm Water Discharges Associated With Industrial Activities Under The South Carolina NPDES General Permit #SCR000000* along with the first fiscal year's annual operating fee of $75. ❑ Yes/NA ❑ No

2. We have prepared and implemented a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the requirements of the general permit. Our SWPPP includes the following items: ❑ Yes/NA ❑ No

    A. *Best Management Practices (BMPs)* we will use at our facility to control the discharge of storm water. The BMPs are also designed to prevent and/or minimize storm water exposure to pollutants and to provide sediment and erosion control. ❑ Yes/NA ❑ No

B. A description of your *Pollution Prevention Team* that includes which individual or individuals within your facility are members of this team and are responsible for developing the SWPP and assisting your facility or plant manager in its implementation, maintenance, and revision. Individual responsibilities also need to be identified. ❑ Yes/NA ❑ No

C. A *site map* indicating an outline of the portions of the drainage area of each storm water outfall that are within your facility boundaries, each existing structural control measure to reduce pollutants in storm water runoff, surface water bodies, locations where significant materials are exposed to precipitation, locations where major spills or leaks have occurred, and the locations of the following activities where such activities are exposed to precipitation: fueling stations, vehicle and equipment maintenance and/or cleaning areas, loading/unloading areas, locations used for the treatment, storage or disposal of wastes, liquid storage tanks, processing areas and storage areas. ❑ Yes/NA ❑ No

D. A *prediction* of the direction of flow, and an identification of the types of pollutants which are likely to be present in storm water discharges associated with industrial activity for each area of your facility that generates storm water discharges associated with industrial activity with a reasonable potential for containing significant amounts of pollutants. Factors to consider include the toxicity of chemical; quantity of chemicals used, produced or discharged; the likelihood of contact with storm water; and history of significant leaks or spills of toxic or hazardous pollutants. Flows with a significant potential for causing erosion shall be identified. ❑ Yes/NA ❑ No

E. A narrative *description of the potential pollutant* sources at the following areas: loading and unloading operations; outdoor storage activities; outdoor manufacturing or processing activities; significant dust or particulate generating processes; and on-site waste disposal practices. The description shall specifically list any significant potential source of pollutants at the site and for each potential source, any pollutant or pollutant parameter (e.g. biochemical oxygen demand, etc.) of concerns shall be identified. ❑ Yes/NA ❑ No

F. An *inventory* of the types of materials handled at your facility that potentially may be exposed to precipitation. Such inventory shall include a narrative description of significant materials that have been handled, treated, stored or disposed in a manner to allow exposure to storm water; method and location of onsite storage or disposal; materials management practices employed to minimize contact of materials with storm water runoff; the location and a description of existing structural and non-structural control measures to reduce pollutants in storm water runoff; and a description of any treatment the storm water receives. ❑ Yes/NA ❑ No

G. A *list of significant spills and significant leaks* of toxic or hazardous pollutants that occurred at areas that are exposed to precipitation or that otherwise drain to a storm water conveyance at your facility. ❑ Yes/NA ❑ No

H. A summary of existing discharge *sampling data* describing pollutants in storm water discharges from your facility. ❑ Yes/NA ❑ No

I. A *description of storm water management controls* appropriate for your facility. This needs to address the following minimum components, including a schedule for implementing these controls: good housekeeping, preventive maintenance, spill prevention and response procedures, inspection, employee training, record keeping and internal reporting procedures, non-storm water discharges, sediment and erosion control, and management of runoff. ❑ Yes/NA ❑ No

J. The plan includes a *certification* signed by the appropriate company official that the facility's discharge has been tested or evaluated for the presence of non-storm water discharges. The certification must identify potential sources of non-storm water at the site, a description of the results of any test and/or evaluation, the criteria or method used, the date tested or evaluated, and the drainage points evaluated. ❑ Yes/NA ❑ No

K. *Additional requirements for industries subject to Form R reporting under SARA Title III, Section 313:* In areas where Section 313 water priority chemicals are present, appropriate containment, drainage control, and/or diversionary structures shall be provided. In addition these areas must be operated and maintained in a manner to minimize discharges of these chemicals to the environment. Appropriate security and training must also be provided to prevent the accidental or intentional release of water priority chemicals. The SWPPP for a facility subject to the Form R reporting requirements must contain a discussion of the measures taken to conform to the additional requirements and must be reviewed and certified by a South Carolina Registered Professional Engineer once every three years and after significant modifications are made to the facility. ❑ Yes/NA ❑ No

3. We retain our SWPPP on-site and it is signed by the appropriate company official. We have also checked to see if our plan requires the signature of a Professional Engineer and have had it signed by one if it is needed. ❑ Yes/NA ❑ No

4. We periodically perform self-inspections to make sure that we are in compliance with our permit. This includes inspecting our BMPs. We document these inspections and keep the records on site with our SWPPP. ❑ Yes/NA ❑ No

5. Any deficiencies that we note in our inspections are corrected as soon as possible. ❑ Yes/NA ❑ No

6. We update our SWPPP as is necessary to address any deficiencies noted during inspections. ❑ Yes/NA ❑ No

7. We have a Comprehensive Site Compliance Evaluation conducted at least once per year by qualified personnel. We keep a report summarizing the scope of the evaluation, personnel making the evaluation, major observations, and actions taken as a part of our SWPPP. ❑ Yes/NA ❑ No

8. We modify our SWPPP to address any deficiencies noted by the evaluation. ❑ Yes/NA ❑ No

9. Some facilities are required to monitor their storm water discharge on either a yearly or semiannual basis. For example, storage piles of solid chemicals used as raw materials that are exposed to precipitation at facilities classified as SIC 30 (Rubber and Miscellaneous Plastics Products) or SIC 28 (Chemicals and Allied Products) require annual storm water monitoring. We know and understand what our facility's monitoring requirements are and complete them as necessary. ❑ Yes/NA ❑ No

10. We submit documentations of inspections, yearly Comprehensive Site Compliance Evaluation, sampling results and etc. to the Bureau of Water if they so request. ❑ Yes/NA ❑ No

11. Our facility operator completes and submits a Notice of Termination (NOT) form to the appropriate NPDES permitting authority if we need to discontinue permit coverage. We know that we will need to keep our SWPPP (and all of the records that are a part of it) for at least one year after our permit is terminated. ❑ Yes/NA ❑ No

NPDES Storm Water Checklist: Individual Permit

1. We have filed for a General Permit and been informed that we are required to obtain NPDES storm water coverage under an individual permit. We have worked out the requirements of this permit with the Bureau of Water. ❑ Yes/NA ❑ No

2. We understand the requirements of our individual permit and have ensured that we meet all of these requirements. ❑ Yes/NA ❑ No

3. We know whom to contact if we have any questions or concerns about our individual permit. ❑ Yes/NA ❑ No

EPA Definition of No Exposure in Storm Water Permitting

No exposure means all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt and/or runoff.

Industrial materials and activities include, but are not limited to, material handling equipment or activities; industrial machinery; raw materials, intermediate products, by-products, and final products; or waste products.

Material handling activities include storage, loading and unloading, transportation or conveyance, of any raw material, intermediate product, by-product, final product or waste product.

Many final products which are meant to be used outdoors (e.g., automobiles) pose little risk of storm water contamination, i.e., the products cannot be mobilized by precipitation or runoff, and are thus exempt from the requirement that these products be sheltered to qualify for no exposure. Similarly, the containers, racks and other transport platforms (e.g., wooden pallets) used for the storage or conveyance of these final products can also be stored outside, providing the containers, racks and platforms are pollutant-free.

Storm-resistant shelters include completely roofed and walled buildings or structures, as well as structures with only a top cover but no side coverings, provided material under the structure is not otherwise subject to any run-on and subsequent runoff of storm water.

EPA acknowledges there are circumstances where permanent, uninterrupted sheltering of industrial activities or materials is not possible. Under such conditions:

• Materials and activities may be sheltered with temporary covers (e.g., tarpaulins) until permanent enclosure can be achieved.

• The no exposure provision does not specify every such situation, but NPDES permitting authorities can address this issue on a case-by-case basis, i.e., determine if the temporary covers will meet the requirements of this section.

• In general, EPA recommends that temporary sheltering of industrial materials and activities only be allowed during facility renovation or construction.

1. Industrial Materials / Activities That Do Not Require a Storm Resistant Shelter

While the intent of the no exposure exclusion is to promote a condition of permanent no exposure, a storm-resistant shelter is not required for the following industrial materials and activities:

A. Drums, Barrels, Tanks and Similar Containers. Drums, barrels, tanks and similar containers that are sealed ("sealed" means banded or otherwise secured and without operational taps or valves), are not exposed provided those containers are not deteriorated and do not leak. Unless the drums, barrels, etc., are opened while outdoors, or are deteriorated or leak, they will likely not constitute a risk of contaminating storm water runoff. Consider the following in making your no exposure determination:

- Containers can only be stored outdoors; any addition or withdrawal of material to / from containers while outdoors will not allow you to certify no exposure.

- Simply moving containers while outside does not create exposure.

- Inspect all outdoor containers to ensure they are not open, deteriorated or leaking. The EPA recommends that a designated individual regularly conduct these inspections. Any time external containers are open, deteriorated or leaking, they must immediately be closed, replaced or sheltered.

-Containers, racks and other transport platforms (e.g., wooden pallets) used with the drums, barrels, etc., can be stored outside providing they are contaminant-free.

B. Above Ground Storage Tanks (ASTs). In addition to generally being considered not exposed, ASTs may also be exempt from the prohibition against adding or withdrawing material to / from external containers. ASTs typically utilize transfer valves to dispense materials that support facility operations (e.g., heating oil, propane, butane, chemical feedstocks) or fuel for delivery vehicles (gasoline, diesel, compressed natural gas). For ASTs to be operational and qualify for no exposure:

- They must be physically separated from and not associated with vehicle maintenance operations.

- There must be no piping, pumps or other equipment leaking contaminants that could contact storm water.

The EPA recommends, wherever feasible, that ASTs be surrounded by some type of physical containment (e.g., an impervious dike, berm or concrete retaining structure) to prevent runoff in the event of a structural failure or leaking transfer valve. Note: any resulting unpermitted discharge would violate the CWA.

C. Lidded Dumpsters. Lidded dumpsters containing waste materials, providing the containers are completely covered and nothing can drain out holes in the bottom, or is lost in loading onto a garbage truck. Industrial refuse and trash that is stored uncovered, however, is considered exposed.

D. Adequately maintained vehicles, such as trucks, automobiles, forklifts, trailers or other general-purpose vehicles found onsite—but not industrial machinery—that are not leaking or are otherwise a potential source of contaminants.

- Vehicles passing between buildings will likely come into contact with precipitation at some time, but so long as they are adequately maintained they will not cause a condition of exposure. Similarly, non-leaking vehicles awaiting maintenance at vehicle maintenance facilities are not considered exposed

-The mere conveyance between buildings of materials / products that would otherwise not be allowed to be stored outdoors, does not create a condition of exposure, provided the materials / products are adequately protected from precipitation and could not be released as a result of a leak or spill.

E. Final products built and intended for use outdoors (e.g., new cars), provided the final products have not deteriorated or are otherwise a potential source of contaminants. Types of final products not qualifying for a certification of no exposure:

- Products that would be mobilized in storm water discharges (e.g., rock salt).

- Products which may, when exposed, oxidize, deteriorate, leak or otherwise be a potential source of contaminants (e.g., junk cars; stockpiled train rails).

- "Final" products which are, in actuality, "intermediate" products. Intermediate products are those used in the composition of yet another product (e.g., sheet metal, tubing and paint used in making tractors).

-Even if the intermediate product is "final" for a manufacturer and destined for incorporation in a "final product intended for use outdoors," these products are not allowed to be exposed because they may be chemically treated or are insufficiently impervious to weathering.

2. Other Potential Sources of Contaminants

A. Particulate Emissions From Roof Stacks and/or Vents. As stated in the Phase II regulation, particulate emissions from roof stacks / vents do not cause a condition of exposure, provided they are in compliance with other applicable environmental protection programs (e.g., air quality control programs) and do not cause storm water contamination. Deposits of particles or residuals from roof stacks / vents not otherwise regulated and which could be mobilized by storm water runoff, are considered exposed. Exposure also occurs when, as a result of particulate emissions, pollutants can be seen being "tracked out" or carried on the tires of vehicles.

B. Acid Rain Leachate. As affirmed by a recent Environmental Appeals Board decision against the General Motors Corporation, CPC-Pontiac Fiero Plant (CWA Appeal No. 96-5), industrial facilities are also responsible for storm water discharges which contain pollutants resulting from the leaching effect of acidic precipitation on metal building structures. Therefore, operators must be aware when they attempt to certify a condition of no exposure of the existence of structural elements that could be soluble as a result of contact with precipitation (e.g., uncoated copper roofs). If the dissolved metals or other contaminants could cause or contribute to a water quality violation, a condition of no exposure cannot be certified.

C. Pollutants Potentially Mobilized by Wind. Windblown raw materials cause a condition of exposure. This is to alert operators to situations where materials sheltered from precipitation can still be deemed exposed if the materials can be mobilized by wind.

Please be aware that even if you certify no exposure, your NPDES permitting authority can still require you to apply for an individual or general permit if it has determined that your discharge is contributing to the violation of, or interfering with the attainment or maintenance of, water quality standards, including designated uses.

B: Air

Chemical Industry Sector

Guide to South Carolina Environmental Regulations

May 2004

South Carolina Department of Health and Environmental Control

Air Regulatory Requirements Checklist

Because air permits tend to be very complex, this checklist is set up differently than the other checklists. This checklist has been set up to just determine whether or not you may need an air permit. If you answer *Yes* to any of the following questions or statements, then there may be a chance that you need to have an air permit.

1. Do you have any air pollution control devices present on any process or equipment? Some examples of these would be: scrubbers, baghouses, and cyclones. ❑ Yes ❑ No/NA
2. Are any of the following fuel-burning sources present at your facility: boilers, furnaces, incinerators, or other fuel-burning sources? ❑ Yes ❑ No/NA
3. Do you use natural gas, fuel oil, propane or another type of fuel? ❑ Yes ❑ No/NA
4. Do you have any storage vessels? Some examples of these would be silos and tanks. ❑ Yes ❑ No/NA
5. Do you have any parts cleaning or degreasing equipment present at your facility? ❑ Yes ❑ No/NA
6. Do you have any extractors present at your facility? ❑ Yes ❑ No/NA
7. Do you have any reactors present at your facility? ❑ Yes ❑ No/NA
8. Is there any distillation equipment at your facility? ❑ Yes ❑ No/NA
9. Do you have any materials on-site in excess of 10,000 pounds? ❑ Yes ❑ No/NA
10. Do you have stacks or vents that route process emissions to the outside air? ❑ Yes ❑ No/NA
11. Do you have valves and flanges present in your process equipment? ❑ Yes ❑ No/NA

If you answered *Yes* to any of the above questions then you need to contact the Bureau of Air Quality at (803) 898-4123 to determine if you need a permit or qualify for an exemption to come into compliance, there is a list of additional information and Bureau contacts at the end of this section.

C: Underground Storage Tank

Chemical Industry Sector

Guide to South Carolina Environmental Regulations

May 2004

DHEC

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South Carolina Department of Health and Environmental Control

Underground Storage Tanks Regulatory Requirements

An Underground Storage Tank (UST) is any tank, including the connected underground piping, whose volume is 10% or more beneath the surface of the ground that is used, or has been used, to store a “regulated substance.” These substances include liquid petroleum (but not propane) or certain hazardous substances. Some oil/water separators are also subject to UST requirements.

Underground Storage Tank regulations include spill and overfill prevention, corrosion protection, release detection, management practices, equipment standards, cleanup requirements for leaks, and financial responsibility. The regulations are in place to prevent the contents of the tank from being released into the environment and contaminating groundwater (the source of drinking water for many American households and businesses).

UST Checklist

If you answer *Yes* or *NA* (not applicable) to **all** of the questions in this section then you are on the right track to being in compliance. However, if you answer *No* to **any** of the questions you may not be complying with all of the requirements under South Carolina and Federal Environmental Laws and Regulations. If you need help determining how to come into compliance, there is a list of additional information and Bureau contacts at the beginning of this book.

1. An UST of 1,100 gallons or less capacity that is used exclusively for farm or residential motor fuel does not have to be registered. Also, USTs storing heating oil used exclusively for on-site consumption do not need to be registered. All other USTs, both "in-use" and "out-of-service," must be registered. ❑ Yes/NA ❑ No

   All of our USTs that require it are registered with the state.

2. All new USTs must be permitted. The UST owner must first obtain a *Permit to Install* prior to installing the system. A *Permit to Operate* must be obtained after installation, but before operating the system. A *Permit to Operate* is valid for the life of the system. ❑ Yes/NA ❑ No

   All of our registered USTs have the required permits with the state.

3. Annual registration fees are assessed for both "in-service" and "out-of-service" USTs. There is an annual registration fee of $100 per UST. The UST owner or operator must display a registration certificate at the site where the UST is located. The registration certificate is valid for one year and is issued when the annual fees are paid. ❑ Yes/NA ❑ No

   Our company has paid the annual registration fee for our UST(s) and posted the registration certificate as required.

4. We have the necessary spill prevention measures in place and they are operational. This includes a spill bucket that does not have any cracks or holes and a drain mechanism that is not broken or impaired by debris. (Spill prevention is not required for USTs in proper temporary closure or that never receive deliveries of more than 25 gallons.) ❑ Yes/NA ❑ No

5. We have an appropriate overfill prevention device (such as a flapper valve, an alarm, or a ball float valve) in place and it is operational. (Overfill prevention is not required for USTs in proper temporary closure or that never receive deliveries of more than 25 gallons.) ❑ Yes/NA ❑ No

6. Corrosion protection systems must protect the buried tank and any metal piping components (such as swing joints, flex-connector, and etc.) that are not isolated from the soil. We have a corrosion protection system in place that is operated and maintained to provide continuous protection and it has been tested in the last three years (corrosion protection must be maintained on USTs in temporary closure).
   -OR-
   We have a system for which corrosion protection is not required and we have records available to document this fact. ❑ Yes/NA ❑ No

7. We inspect any UST systems with impressed current cathodic protection every 60 days and record the rectifier readings. ❑ Yes/NA ❑ No

8. Any of our tanks that are lined are inspected internally within 10 years of installation of the lining and every 5 years thereafter. ❑ Yes/NA ❑ No

9. All tanks that contain hazardous substances are double-walled. ❑ Yes/NA ❑ No

10. IF any tanks or piping undergo structural repairs:
    A. The system is internally inspected after the repair OR monitored for releases using a monthly monitoring method OR the system is tested using another approved method. ❑ Yes/NA ❑ No
    B. The system was tightness tested within 30 days of the completion of the repair. ❑ Yes/NA ❑ No
    C. IF the repairs were made to a cathodically protected UST, corrosion protection systems were tested and/or inspected within 6 months of the repair. ❑ Yes/NA ❑ No
    D. We keep records of all UST system repairs for the operating life of the UST system. ❑ Yes/NA ❑ No

11. All of our USTs have been equipped with a permissible method of release detection that is able to detect a release from any portion of the UST system that routinely contains product. This release detection system is operational and meets the necessary performance standards. ❑ Yes/NA ❑ No

12. Our tanks and piping are monitored monthly for releases and we have the records of this available (at a minimum, we have records for the past 12 months of operation). ❑ Yes/NA ❑ No

13. Designated employees are familiar with applicable release reporting procedures. ❑ Yes/NA ❑ No

14. We have reported our financial responsibility mechanism. ❑ Yes/NA ❑ No

15. We notified the UST Program at least 30 days prior to the permanent closure date of any UST and keep site assessment results for 3 years. ❑ Yes/NA ❑ No

D: Solid Hazardous Waste

Chemical Industry Sector

Guide to South Carolina Environmental Regulations

May 2004

South Carolina Department of Health and Environmental Control

Solid and Hazardous Waste Regulatory Requirements

The term “solid waste” can be slightly confusing. Despite the word “solid” in its label, solid waste actually refers to any garbage, refuse, sludge, or other discarded material including solid, liquid, semi-solid, or contained gaseous materials. If any of theses items are bi-products of the processes at your facility, then you need to make sure that you are properly disposing of them.

The first thing that you need to do to properly dispose of solid waste is to determine if it is hazardous or not. Hazardous wastes have special disposal requirements that are discussed in the next section. Some wastes that are not regulated hazardous wastes still require special methods of disposal. These wastes are termed “special wastes” and are discussed below. If a solid waste is determined to be neither hazardous nor special, then it may be placed in one of three types of landfills depending on the characteristics of the waste. If you have any questions or concerns about your solid wastes please check with your regulatory authority about its proper disposal method.

Construction and Demolition/Land Clearing Debris Landfill:
A Construction and Demolition (C & D) Landfill is for, as the name implies, construction and demolition debris. Beneficial fills must be separated out of debris gong to a C & D landfill. Shrubs, brush, tree remains, and other materials generated by operations to prepare land for development should go to a Land Clearing Debris Landfill.

Industrial Landfill:
There are three categories of Industrial Landfills. The breakdown is based on the maximum contamination level for drinking water of the various contaminants that are included in a Toxicity Characteristic Leaching Procedure (TCLP). A Category I Industrial Landfill can have leachate that contains up to ten times the maximum contaminant level (MCL) from the TCLP. The leachate from a TCLP for a Category II is from ten to thirty times the MCL and Category III can be up to thirty times the MCL.

Municipal Solid Waste Landfills:
Municipal Solid Waste Landfills are for other non-hazardous, solid wastes that have a liquid content sufficient to pass the Apaint Filter A Test with the exception of: used motor oil, white goods, lead/acid batteries, yard wastes and land clearing debris, and whole tires. These exceptions have special requirements for disposal.

Used motor oil must be label “Used Oil” before it is recycled, re-refined, or reused. White goods need to have their hazardous components removed and then the metal content should be recycled. Lead/Acid batteries must be recycled by a licensed facility to recover component materials. Yard wastes and land clearing debris must be composted or otherwise beneficially used. They can also be placed in a Land Clearing Debris Landfill. Whole tires should be recycled for their energy content, ground and recycled for their rubber value, or cut into eighths before being placed in a landfill.

Special Wastes

Special wastes are solid wastes that are not regulated hazardous wastes but are still difficult or dangerous to handle and require unusual management by the landfill. These special wastes include, but are not limited to:
-pesticide wastes

-liquid wastes or bulk liquid wastes
-sludges
-industrial process wastes of cutting oils, chemical catalysts, distillation bottoms, etching acids, equipment cleanings, paint sludges, core sands, metallic or asbestos dust, and contaminated or recalled wholesale or retail products
-waste from a pollution control process
-residue or debris from the clean up of a spill or release of chemical substances
-materials that contaminated from the cleanup of a facility or site formerly used for the generation, storage, treatment, reclamation, or disposal of listed wastes
-containers and drums

Special wastes, such as the ones above, cannot be accepted by a municipal waste landfill without prior written approval by the disposal facility in accordance with DHEC regulations that include waste parameters, test methods, sampling methods, analysis verification schedules, and verification methods.

Hazardous Wastes

Hazardous wastes are solid wastes that exhibit hazardous characteristics such as ignitability, corrosivity, reactivity, or toxicity. You should determine if any of your solid wastes are hazardous by using your personal knowledge of your wastes to determine if they have any hazardous characteristics and reference lists of hazardous wastes. Material Safety Data Sheets (MSDSs) are available from material suppliers and will list characteristics of materials that may later make them hazardous wastes. (There are instructions in the fact sheet section on how to read a MSDS.) Material Safety Data Sheets should help in determining if a material may become a hazardous waste, they do not replace analytical determinations of hazardous waste characteristics.

Hazardous wastes require special disposal. The checklists in the next section will help you determine if you are disposing of your hazardous wastes properly.

SOUTH CAROLINA HAZARDOUS WASTE COMPLIANCE CHECKLIST
CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR

FACILITY_____
EPA ID # _____
INSPECTOR _____
DATE _____

HAZARDOUS WASTE DETERMINATION MADE ON SOLID WASTE	
GENERATOR QUANTITY LIMITATIONS FOR CESQG	
A) Less than 100 kilograms per month generated B) Less than 1 kilogram per month acute hazardous waste generated C) Less than 100 kilograms per month residue, soil, waste, or other debris from clean-up of acute hazardous waste spill	
GENERATOR ACCUMULATION LIMITATIONS FOR CESQG	
A) Less than 1000 kilograms accumulated B) Less than 1 kilogram of acute hazardous waste accumulated C) Less than 100 kilograms of residue, soil, waste, or other debris from clean-up of acute hazardous waste spill	
GENERATOR PROPERLY DISPOSES OF THE HAZARDOUS WASTE GENERATED	
A) On-site treatment/disposal criteria met B) Ensures that waste is received by off-site facility that meets requirements	

ND - No Deficiency
NA - Not Applicable
D - Deficiency
C - Concern

Compliance Monitoring Inspection Checklist
For
Small Quantity Generators

South Carolina Department of
Health and Environmental Control

Bureau of Land and Waste Management

Division of Compliance and Enforcement

October 1, 2003

Table of Contents

Inspection Information

Company name:_____

USEPA ID Number:_____

Date of Inspection:_____

Inspector(s):_____

Company contacts:_____

Brief statement of company's activity:_____

_____

Hazardous waste determinations 262.11(GGR)

Has generator accurately determined if all solid wastes are hazardous wastes by the following procedures?		
(a) Did he determine his waste was excluded under 261.4?	_____Yes	_____No(!)
(b) Did he determine his waste was listed in subpart D of 261?	_____Yes	_____No(!)
(c) (1) Did he test his waste? **Or**	_____Yes	_____No(!)
(2) Apply knowledge of the hazard characteristics of the waste in light of the materials or process used?	_____Yes	_____No(!)
(d) Did he review applicable regulations to determine if other exclusions or restrictions apply?	_____Yes	_____No
(e) Did he determine if the waste was listed in appendix XI of 261?	_____Yes	_____No

Identification numbers 262.12 (GGR)

(a) Has the generator treated, stored, disposed of, transported, or offered for transport, hazardous waste without having received an identification number? *Note- Generators who have not received an ID number may obtain one by submitting DHEC form 2701 as required by this part and 262.13.	_____Yes(!)	_____No
(c) Has the generator offered his hazardous waste to a transporter, or TSDF who has not received an ID number?	_____Yes(!)	_____No

Notification requirements for generators 262.13 (GGR)

(b) Has generator filed a new form 2701 upon generation of a new waste stream at his site?	_____Yes	_____No(!)
(c) If generator produces a waste that has been newly classified or listed as a hazardous waste, did he file a revised form 2701?	_____Yes	_____No(!)
(d) Has the generator filed a new form 2701 each time information previously provided becomes outdated?	_____Yes	_____No(!)
(e) If generator is a producer of fuel from hazardous waste, or used oil, a burner of these products for energy recovery, or distributor of these products, has he made separate notification of these activities?	_____Yes	_____No(!)
(f) If company no longer generates hazardous waste, has he notified the Department on a subsequent submission of form 2701?	_____Yes	_____No(!)

Manifest requirements 262.20 (GMR)

(a) Does generator use manifest (DHEC 1988, Manifest OMB number 2050-0039, or EPA form 8700-22) when shipping hazardous waste offsite?	_____Yes	_____No(!)
(b) Does generator designate on the manifest one facility which is permitted to handle the waste?	_____Yes	_____No(!)
(c) If necessary, does generator designate an alternate facility?	_____Yes	_____No(!)
(d) If transporter was not able to deliver the waste, did the generator designate an alternate facility or instruct the transporter to return the waste?	_____Yes	_____No(!)
(e) The manifest requirements do not apply to small quantity generators if the following requirements are met:		
(1) Is their waste is reclaimed under a contractural agreement?	_____Yes	_____No(!)
(i) Is the type of waste and frequency of shipments are specified in the agreement?	_____Yes	_____No(!)
(ii) Is the vehicle used to transport the waste and return the regenerated material back to the generator owned and operated by the reclaimer of the waste?	_____Yes	_____No(!)
(2) Is there a copy of the agreement available onsite?	_____Yes	_____No(!)
(f) Note* Manifests do no have to be used to transport waste on public or private rights of way within or along the border of contiguous property		
(g) If the generator ships waste offsite, is he is he permitted, or does he utilize a transporter who is?	_____Yes	_____No(!)
Required information on the manifest 262.21		
(a) Is the manifest completed as required by the instructions printed on back?	_____Yes	_____No(!)
Does it also include:		
(1) Manifest document number?	_____Yes	_____No(!)
(2) Generator's name, address, phone number, and ID number?	_____Yes	_____No(!)
(3) Name and ID number of each transporter?	_____Yes	_____No(!)
(4) Name, address and ID number of designated facility and, if any, alternate facility?	_____Yes	_____No(!)
(5) DOT description of waste?	_____Yes	_____No(!)

(6) Total quantity if each waste by units of weight and the type and number of containers as loaded onto the transport vehicle?	_____Yes	_____No(!)
(7) Does manifest conform with the requirements of the receiving state?	_____Yes	_____No(!)
(8) If waste destined for a state that does not require a manifest, was a manifest as designated by the Department used?	_____Yes	_____No(!)
(9) The following additional information must be supplied on the manifest:	_____Yes	_____No(!)
(i) Items 19 and 35: Discrepancy indication space - does the TSDF enter that actual weight in pounds in this space it the amount varies any from that specified by the generator or if the generator uses units of measure other than pounds.	_____Yes	_____No(!)
(ii) Does the manifest include the OMB burden statement?	_____Yes	_____No(!)
(iii) Have items A-K and L-T been completed?	_____Yes	_____No(!)
(b) Does the SC generator's certification appear on the manifest?	_____Yes	_____No(!)
Numbers of Copies 262.22		
Does the generator supply enough copies of the manifest so that each transporter and owner/operator of the TSDF will have its own copy?	_____Yes	_____No(!)
Use of the Manifest 262.23		
(a)(1) Does the generator sign the manifest certification by hand?	_____Yes	_____No(!)
(2) Obtain handwritten signature from the initial transporter and date of acceptance?	_____Yes	_____No(!)
(3) Does generator retain one copy?	_____Yes	_____No(!)
(b) Does generator give transporter remaining copies?	_____Yes	_____No(!)
(d) For rail shipments, does generator send at least three copies of manifest dated and signed to:	_____Yes	_____No(!)
(1) The next non-rail transporter?	_____Yes	_____No(!)
(2) The designated facility if transported solely by rail?	_____Yes	_____No(!)
(3) The last rail transporter to handle the waste?	_____Yes	_____No(!)

Pre-transport requirements 262 – subpart C (GPT)

Packaging 262.30 Before transporting, or offering for transport, does generator package hazardous waste in accordance with DOT regulations?	_____Yes	_____No(!)
Labeling 262.31 Before transporting, or offering for transport, does generator mark each container of 110 gallons or less with the following:		
• HAZARDOUS WASTE – federal law prohibits improper disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.	_____Yes	_____No(!)
• Generator's name and address	_____Yes	_____No(!)
• Manifest document number	_____Yes	_____No(!)
• Accumulation start date	_____Yes	_____No(!)
Placarding 262.33 Before transporting, or offering for transport, does generator does generator placard, or offer appropriate placards to initial transporter?	_____Yes	_____No(!)
Accumulation Time 262.34 (d) has generator accumulated haz. wst. onsite for greater than 180 days?	_____Yes	_____No
(1) Has generator exceeded 13,200 lbs of haz. wst. onsite at any time?	_____Yes	_____No
(2) Does generator comply with subpart I of 265?	_____Yes	_____No
(3) Does generator comply with subpart J of 265?	_____Yes	_____No
(4) Is each storage container marked with an accumulation start date and EPA hazardous waste numbers?	_____Yes	_____No
(5)(i) Is there always at lease one person on the premises or on call to act as emergency coordinator?	_____Yes	_____No
(ii) Is the following information posted next to the telephone: (A) The name and telephone number of the emergency coordinator? (B) Location of fire extinguishers, spill control equipment, and if present, fire alarm?	_____Yes	_____No(!)
(C) The telephone number of the fire department unless the facility has a direct alarm?	_____Yes	_____No(!)
(iii) Has the generator ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal and emergency operations?	_____Yes	_____No(!)
(f) If small quantity generator exceeded generation rate of accumulation rate, did he comply with standards applicable to treatment, storage, or disposal facilities?	_____Yes	_____No(!)
Satellite accumulation 262.34 (c)(1) Does the generator accumulate no more than 55 gallons of hazardous waste or no more than one quart of acutely hazardous waste at or near the point of generation?	_____Yes	_____No(!)
(i) Does he comply with 265,171, 172, & 173(a)?	_____Yes	_____No(!)
• 265.171 is the container in good condition?	_____Yes	_____No(!)

• 265.172 is the container compatible with the waste?	_____Yes	_____No(!)
• 265.173(a) is the container always closed?	_____Yes	_____No(!)
(ii) Is the container marked either as “HAZARDOUS WASTE”, or with other words that identify its contents?	_____Yes	_____No(!)
(iii) Is the generator complying with 265.16(a)(1) & (d)(4)?	_____Yes	_____No(!)
• 265.16(a)(1)- do facility personnel successfully complete a program of classroom or OJT that teaches them to perform their duties in a way that ensures compliance with this part? Does it include all elements described in paragraph (d)(3)?		
• (d)(3)- is the training program designed to ensure that personnel are able to respond effectively to emergencies by familiarizing then with emergency procedures, equipment and systems and where applicable:	_____Yes	_____No(!)
• (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment	_____Yes	_____No(!)
• (ii)Key parameters for automatic waste feed cut-off systems;	_____Yes	_____No(!)
• (iii)Communications or alarm systems	_____Yes	_____No(!)
• (iv) Response to fires and explosions	_____Yes	_____No(!)
• (v) Response to groundwater contamination	_____Yes	_____No(!)
• (vi) Shutdown of operations	_____Yes	_____No(!)
• (d)(4) Are records kept that document this required training?	_____Yes	_____No(!)
(c)(2) Does generator remove any excess of fifty-five gallons from the satellite accumulation area, and comply fully with all requirements with respect to this excess waste?		

Record keeping and Reporting 262 – Subpart D (GRR)

Record keeping 262.40 (a) Does generator keep a copy of each manifest onsite for at least three years? (c) Does generator keep test results, waste analysis, or other documentations made in accordance with 262.11 for at least three years?	_____Yes _____Yes	_____No(!) _____No(!)
Exception reports 262.42 (b) If generator did not receive a copy of any manifest with a signature of the designated facility within 60 days, did he submit a legible copy of the manifest to the Department with a notation that he has not received confirmation of the delivery?	_____Yes	_____No(!)
Special requirements for small quantity generators 262.44 (b) Has generator submitted his annual declaration of generator status on or before January 31 using DHEC form 1961?	_____Yes	_____No(!)
Discharge reporting and Cleanup 262.90 Did generator cleanup any discharges of hazardous waste so that it no longer presents a hazard to human health or the environment?	_____Yes	_____No(!)

Use and Management of Containers 265 – Subpart I (GGR)

Condition of containers 265.171 Does generator transfer waste from containers in poor condition into containers in good condition?	_____Yes	_____No(!)
Compatibility of waste with container 265.172 Are all containers compatible with the waste they contain?	_____Yes	_____No(!)
Management of containers 265.173 (a) Are containers closed except when adding or removing waste?	_____Yes	_____No(!)
(b) Are containers being handled in such a way as to prevent rupture or leaking?	_____Yes	_____No(!)
(c) Is each container marked with the following or equivalent statement: "Hazardous waste – federal laws prohibit improper disposal."	_____Yes	_____No(!)
(d) Is each container marked with an appropriate EPA waste number?	_____Yes	_____No(!)
Inspections 265.174 Are all areas where containers are stored being inspected at least weekly for leaks and deterioration caused by corrosion or other factors?	_____Yes	_____No(!)
Special requirements for incompatible wastes 265.177 (a) Are incompatible wastes stored in the same containers?	_____Yes	_____No(!)
(b) Are haz. wsts. being placed in unwashed containers that previously held incompatible wastes?	_____Yes	_____No(!)
(c) Are incompatible wastes separated by a barrier?	_____Yes	_____No(!)

Tank Systems 265 – subpart J (GOR)

Special requirements for SQG's that store waste in tanks		
(b)(1) Does generator comply with 265.17(b)?	_____Yes	_____No(!)
(2) Are wastes or treatment reagents being added to tank that might cause tank or liner to fail?	_____Yes	_____No(!)
(3) Are uncovered tanks operated with at least 2 feet freeboard unless equipped with containment?	_____Yes	_____No(!)
(4) If wastes are continuously fed , is it equipped with means to cut off flow?	_____Yes	_____No(!)
Are the following being inspected:		
(c)(1) Discharge control equipment, daily?	_____Yes	_____No(!)
(2) Monitoring data, daily?	_____Yes	_____No(!)
(3) Tank levels, daily?	_____Yes	_____No(!)
(4) Construction materials of the tank, weekly?	_____Yes	_____No(!)
(5) Construction materials of, and area surrounding discharge confinement structures, weekly?	_____Yes	_____No(!)
(d) At closure, did the owner remove all haz. wst., discharge control equipment, and discharge confinement structures?	_____Yes	_____No(!)
(e)(1) Have wastes been placed in the tank that were not previously or immediately rendered non-ignitable?	_____Yes	_____No(!)
(2) If ignitable wastes have been placed in the tank, are NFPA buffer zones complied with?	_____Yes	_____No(!)

Land Disposal Restrictions 268 – Subpart A (GLB)

Testing, tracking, and recordkeeping requirements for generators 268.7		
(a) (1) Did the generator determine if his waste had to be treated prior to land disposal?	_____Yes	_____No(!)
(2) If the waste or contaminated soil does not meet a treatment standard, did the generator send a one-time notification to the TSDF that included the following information:	_____Yes	_____No(!)
• Epa hazardous waste number & manifest document number	_____Yes	_____No(!)
• A statement that the waste is prohibited from land disposal	_____Yes	_____No(!)
• Applicable wastewater/non-wastewater category	_____Yes	_____No(!)
• Waste analysis data (when available)	_____Yes	_____No(!)
• For hazardous debris, when treated with the alternate standards: the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45.	_____Yes	_____No(!)
• For contaminated soil, the following statement, "this contaminated soil (does/does not) contain listed waste and (does/does not) exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided by 268.49(c) or the universal treatment standards.	_____Yes	_____No(!)
(3) If the waste or contaminated soil meets the treatment standard at the original point of generation: Did the generator send a one-time notification to the TSDF that included the following information"		
• Epa hazardous waste number & manifest document number	_____Yes	_____No(!)
• A statement that the waste is prohibited from land disposal	_____Yes	_____No(!)
• Applicable wastewater/non-wastewater category	_____Yes	_____No(!)
• Waste analysis data (when available)	_____Yes	_____No(!)
• For contaminated soil, the following statement, "this contaminated soil (does/does not) contain listed waste and (does/does not) exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided by 268.49(c) or the universal treatment standards.	_____Yes	_____No(!)
• The, "penalty of law" statement.	_____Yes	_____No(!)
(4) If the waste is subject to an exemption from LDR treatment standards the generator send the TSDF a one-time notification that included:		
• Epa hazardous waste number & manifest document number	_____Yes	_____No(!)
• A statement that the waste is not prohibited from land disposal	_____Yes	_____No(!)
• Waste analysis data (when available)	_____Yes	_____No(!)
• The date the waste was subject to the prohibition	_____Yes	_____No(!)
• For hazardous debris, when treated with the alternate standards: the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45.	_____Yes	_____No(!)

(5) If the generator is treating prohibited waste in tanks, containers, or containment buildings, does he have a waste analysis plan?	_____Yes	_____No(!)
(6) If generator uses knowledge of process or testing to determine if his waste is restricted from land disposal did he retain all records onsite?	_____Yes	_____No(!)
(7) If generator determines he is managing a prohibited waste that is excluded did he place a non-time notification in his on-site records?	_____Yes	_____No(!)
(8) Did generator retain all records associated with LDR for a period of three years?	_____Yes	_____No(!)
(9)(i) If the generator is managing lab packs and wishes to use the alternate treatment standards for lab packs did he send the TSDF a one-time notification that included:	_____Yes	_____No(!)
• Epa hazardous waste number & manifest document number	_____Yes	_____No(!)
• The, “penalty of law” statement.	_____Yes	_____No(!)

(!) indicates the possibility of non-compliance.

Compliance Monitoring Inspection Checklist
For
Large Quantity Generators

South Carolina Department of
Health and Environmental Control

Bureau of Land and Waste Management

Division of Compliance and Enforcement

October 1, 2003

Table of Contents

Inspection Information

Company name:_____

USEPA ID Number:_____

Date of Inspection:_____

Inspector(s):_____

Company contacts:_____

Brief statement of company's activity:_____

_____

Hazardous waste determinations 262.11 (GGR)

Has generator accurately determined if all solid wastes are hazardous wastes by the following procedures?		
(a) Did he determine his waste was excluded under 261.4?	_____Yes	_____No(!)
(b) Did he determine his waste was listed in subpart D of 261?	_____Yes	_____No(!)
(c) (1) Did he test his waste? **Or**	_____Yes	_____No(!)
(2) Apply knowledge of the hazard characteristics of the waste in light of the materials or process used?	_____Yes	_____No(!)
(d) Did he review applicable regulations to determine if other exclusions or restrictions apply?	_____Yes	_____No
(e) Did he determine if the waste was listed in appendix XI of 261?	_____Yes	_____No

Identification numbers 262.12 (GGR)

(a) Has the generator treated, stored, disposed of, transported, or offered for transport, hazardous waste without having received an identification number? *Note- Generators who have not received an ID number may obtain one by submitting DHEC form 2701 as required by this part and 262.13.	_____Yes(!)	_____No
(c) Has the generator offered his hazardous waste to a transporter, or TSDF who has not received an ID number?	_____Yes(!)	_____No

Notification requirements for generators 262.13 (GGR)

(b) Has generator filed a new form 2701 upon generation of a new waste stream at his site?	_____Yes	_____No(!)
(c) If generator produces a waste that has been newly classified or listed as a hazardous waste, did he file a revised form 2701?	_____Yes	_____No(!)
(d) Has the generator filed a new form 2701 each time information previously provided becomes outdated?	_____Yes	_____No(!)
(e) If generator is a producer of fuel from hazardous waste, or used oil, a burner of these products for energy recovery, or distributor of these products, has he made separate notification of these activities?	_____Yes	_____No(!)
(f) If company no longer generates hazardous waste, has he notified the Department on a subsequent submission of form 2701?	_____Yes	_____No(!)

Manifest requirements 262.20 (GMR)

(a) Does generator use manifest (DHEC 1988, Manifest OMB number 2050-0039, or EPA form 8700-22) when shipping hazardous waste offsite?	_____Yes	_____No(!)
(b) Does generator designate on the manifest one facility which is permitted to handle the waste?	_____Yes	_____No(!)
(c) If necessary, does generator designate an alternate facility?	_____Yes	_____No(!)
(d) If transporter was not able to deliver the waste, did the generator designate an alternate facility or instruct the transporter to return the waste?	_____Yes	_____No(!)
(f) Note* Manifests do no have to be used to transport waste on public or private rights of way within or along the border of contiguous property		
(g) If the generator ships waste offsite, is he is he permitted, or does he utilize a transporter who is?	_____Yes	_____No(!)
Required information on the manifest 262.21		
(a) Is the manifest completed as required by the instructions printed on back?	_____Yes	_____No(!)
Does it also include:		
(1) Manifest document number?	_____Yes	_____No(!)
(2) Generator's name, address, phone number, and ID number?	_____Yes	_____No(!)
(3) Name and ID number of each transporter?	_____Yes	_____No(!)
(4) Name, address and ID number of designated facility and, if any, alternate facility?	_____Yes	_____No(!)
(5) DOT description of waste?	_____Yes	_____No(!)
(6) Total quantity if each waste by units of weight and the type and number of containers as loaded onto the transport vehicle?	_____Yes	_____No(!)
(7) Does manifest conform with the requirements of the receiving state?	_____Yes	_____No(!)
(8) If waste destined for a state that does not require a manifest, was a manifest as designated by the Department used?	_____Yes	_____No(!)
(9) The following additional information must be supplied on the manifest:	_____Yes	_____No(!)

(i) Items 19 and 35: Discrepancy indication space - does the TSDF enter that actual weight in pounds in this space it the amount varies any from that specified by the generator or if the generator uses units of measure other than pounds.	_____Yes	_____No(!)
(ii) Does the manifest include the OMB burden statement?	_____Yes	_____No(!)
(iii) Have items A-K and L-T been completed?	_____Yes	_____No(!)
(b) Does the SC generator's certification appear on the manifest?	_____Yes	_____No(!)
Numbers of Copies 262.22		
Does the generator supply enough copies of the manifest so that each transporter and owner/operator of the TSDF will have its own copy?	_____Yes	_____No(!)
Use of the Manifest 262.23		
(a)(1) Does the generator sign the manifest certification by hand?	_____Yes	_____No(!)
(2) Obtain handwritten signature from the initial transporter and date of acceptance?	_____Yes	_____No(!)
(3) Does generator retain one copy?	_____Yes	_____No(!)
(b) Does generator give transporter remaining copies?	_____Yes	_____No(!)
(d) For rail shipments, does generator send at least three copies of manifest dated and signed to:	_____Yes	_____No(!)
(1) The next non-rail transporter?	_____Yes	_____No(!)
(2) The designated facility if transported solely by rail?	_____Yes	_____No(!)
(3) The last rail transporter to handle the waste?	_____Yes	_____No(!)

Pre-transport requirements 262 – subpart C (GPT)

Packaging 262.30 Before transporting, or offering for transport, does generator package hazardous waste in accordance with DOT regulations?	_____Yes	_____No(!)
Labeling 262.31 Before transporting, or offering for transport, does generator mark each container of 110 gallons or less with the following:		
• HAZARDOUS WASTE – federal law prohibits improper disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.	_____Yes	_____No(!)
• Generator's name and address	_____Yes	_____No(!)
• Manifest document number	_____Yes	_____No(!)
• Accumulation start date	_____Yes	_____No(!)
Placarding 262.33 Before transporting, or offering for transport, does generator does generator placard, or offer appropriate placards to initial transporter?	_____Yes	_____No(!)
Accumulation Time 262.34 (a) Has generator accumulated HW onsite for greater than 90 days?	_____Yes(!)	_____No
(1)(i) Is the waste placed in containers?	_____Yes	_____No
(ii) In tanks*	_____Yes	_____No
(iii) On drip pads*	_____Yes	_____No
(iv) In containment buildings*	_____Yes	_____No
* Complete checklist sections as applicable.		
(2) Are all containers marked with an accumulation start date?	_____Yes	_____No(!)
(3) Is each container and tank labeled or marked clearly with the EPA hazardous waste number and the words, "Hazardous waste – federal laws prohibit improper disposal."	_____Yes	_____No(!)
(4) Does generator comply with the requirements of subparts C & D in section 265?	_____Yes	_____No(!)
(5) Does generator ensure that containers are not stacked more than two containers high? (*Written approval required to stack more than two high.)	_____Yes	_____No(!)
(b) If wastes are stored greater than 90 days, did generator request extension?	_____Yes	_____No(!)
Satellite accumulation 262.34 (c)(1) Does the generator accumulate no more than 55 gallons of hazardous waste or no more than one quart of acutely hazardous waste at or near the point of generation?	_____Yes	_____No(!)
(i) Does he comply with 265,171, 172, & 173(a)?		
• 265.171 is the container in good condition?	_____Yes	_____No(!)
• 265.172 is the container compatible with the waste?	_____Yes	_____No(!)
• 265.173(a) is the container always closed?	_____Yes	_____No(!)
(ii) Is the container marked either as "HAZARDOUS WASTE", or with other words that identify its contents?	_____Yes	_____No(!)

(iii) Is the generator complying with 265.16(a)(1) & (d)(4)?		
• 265.16(a)(1)- do facility personnel successfully complete a program of classroom or OJT that teaches them to perform their duties in a way that ensures compliance with this part? Does it include all elements described in paragraph (d)(3)?	_____Yes	_____No(!)
• (d)(3)- is the training program designed to ensure that personnel are able to respond effectively to emergencies by familiarizing then with emergency procedures, equipment and systems and where applicable:	_____Yes	_____No(!)
• (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment	_____Yes	_____No(!)
• (ii)Key parameters for automatic waste feed cut-off systems;	_____Yes	_____No(!)
• (iii)Communications or alarm systems	_____Yes	_____No(!)
• (iv) Response to fires and explosions	_____Yes	_____No(!)
• (v) Response to groundwater contamination	_____Yes	_____No(!)
• (vi) Shutdown of operations	_____Yes	_____No(!)
• (d)(4) Are records kept that document this required training?	_____Yes	_____No(!)
(c)(2) Does generator remove any excess of fifty-five gallons from the satellite accumulation area, and comply fully with all requirements with respect to this excess waste?	_____Yes	_____No(!)
<u>Additional storage time for F006</u> 262.34		
(g) Does LQG store EPA waste number F006 for 180 days or less?	_____Yes	_____No(!)
(1) Has generator implements pollution prevention practices that reduce amount of hazardous substances, pollutants or contaminants entering F006 or otherwise released to the environment prior to its recycling?	_____Yes	_____No(!)
(2) Is the F006 legitimately recycled through metal recovery?	_____Yes	_____No(!)
(3) Does he accumulate no more than 20,000kilograms(44,000 lbs) of F006 on site at any time?	_____Yes	_____No(!)
(4)(i)(A)Is the F006 placed in containers that comply with subparts I, AA, CC, & CC of 265?	_____Yes	_____No(!)
(B) In tanks that comply with subparts J, AA, BB, CC of 265?	_____Yes	_____No(!)
(C) In P.E. certified containment buildings?	_____Yes	_____No(!)
(1) Are written procedures that demonstrate that the F006 is not stored more than 180 days kept onsite? or	_____Yes	_____No(!)
(2) Documentation that units are emptied at least once every 180 days?		

Record keeping and Reporting 262 – Subpart D (GRR)

Record keeping 262.40		
(a) Does generator keep a copy of each manifest onsite for at least three years?	_____Yes	_____No(!)
(b) Does generator keep a copy of each quarterly report and exception report for at least three years?	_____Yes	_____No(!)
(c) Does generator keep test results, waste analysis, or other documentations made in accordance with 262.11 for at least three years?	_____Yes	_____No(!)
Quarterly Reporting 262.41		
Does generator submit quarterly reports as required?	_____Yes	_____No(!)
Exception reports 262.42		
(a)(1) If generator did not receive a signed copy of a manifest within 35 days of the date of receipt by the initial transporter, did he contact the designated facility to determine the status of the waste?	_____Yes	_____No(!)
(2) If generator did not receive a signed copy of a manifest within 45 days of the date of receipt by the initial transporter, did he submit to the Department an exception report including the following:	_____Yes	_____No(!)
(i) a legible copy of the manifest	_____Yes	_____No(!)
(ii) a cover letter signed by the generator explaining efforts to locate the hazardous waste	_____Yes	_____No(!)
Additional reporting 262.43		
(c) Did generator submit a waste minimization report with his fourth quarter report?	_____Yes	_____No(!)
Discharge reporting and Cleanup 262.90		
Did generator cleanup any discharges of hazardous waste so that it no longer presents a hazard to human health or the environment?	_____Yes	_____No(!)

General Facility Standards 265 – Subpart B (GGR)

General Inspection Requirements 265.15		
(d) Does the owner or operator record inspections in an inspection log or summary?	_____Yes	_____No(!)
• Are these records kept at the facility for at least three years?	_____Yes	_____No(!)
Do these records include:		
• The date and time of the inspection?	_____Yes	_____No(!)
• The name of the inspector?	_____Yes	_____No(!)
• A notation of any observations made?	_____Yes	_____No(!)
• The date and nature of any repairs or other remedial actions?	_____Yes	_____No(!)
Personnel Training 265.16		
(a)(1)Do facility personnel complete a program of classroom or OJT?	_____Yes	_____No(!)
(2) Is this program directed by a person trained in hazardous waste management procedures?	_____Yes	_____No(!)
(3) Is the training program designed to ensure that personnel are able to respond effectively to emergencies by familiarizing then with emergency procedures, equipment and systems and where applicable:	_____Yes	_____No(!)
(i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment	_____Yes	_____No(!)
(ii)Key parameters for automatic waste feed cut-off systems;	_____Yes	_____No(!)
(iii)Communications or alarm systems	_____Yes	_____No(!)
(iv)Response to fires and explosions	_____Yes	_____No(!)
(v) Response to groundwater contamination	_____Yes	_____No(!)
(vi)Shutdown of operations	_____Yes	_____No(!)
(b) Is the required training given to new employees within six months?	_____Yes	_____No(!)
(c) Do employees take part in an annual review of the required training?	_____Yes	_____No(!)
(d) Are the following hazardous waste related training records maintained for each employee?	_____Yes	_____No(!)
(1) Job title for each position at the facility related to HW management	_____Yes	_____No(!)
(2) Written job description for each position at the facility related to HW management	_____Yes	_____No(!)
(3) Written description of the type and amount of both introductory and continuing training that will be given	_____Yes	_____No(!)
(4) Records that document that the training has been given to and completed	_____Yes	_____No(!)
(e) Are training records for current employees kept until closure & are training records for former employees kept for three years?	_____Yes	_____No(!)

Preparedness and Prevention 265- Subpart C (GGR)

Maintenance and Operation 265.31 Is the facility being maintained and operated to minimize the possibility of fire, explosion or release or HW to the environment?	_____Yes	_____No(!)
Required equipment 265.32 Is the facility equipped with the following:		
(a) Internal communication or alarm system capable of providing immediate emergency instruction?	_____Yes	_____No(!)
(b) Telephone or two way radio immediately available at the scene of operation capable of summoning emergency assistance from police, fire of emergency response teams?	_____Yes	_____No(!)
(c) Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?	_____Yes	_____No(!)
(d) Water at adequate volume and pressure?	_____Yes	_____No(!)
Testing and maintenance of equipment 265.33 Is the equipment listed above tested and maintained as necessary?	_____Yes	_____No(!)
Access to communication or alarm system 265.34 (a) When employees are handling HW, do they have immediate access to an alarm or emergency communication device?	_____Yes	_____No(!)
(b) When employees work alone with HW, do they have immediate access to a phone, or two- way radio capable of summoning emergency assistance?	_____Yes	_____No(!)
Required aisle space 265.35 Does the owner/operator maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operated in an emergency?	_____Yes	_____No(!)
Arrangements with local authorities 265.37 (a) Has the owner/operator made the following arrangements:		
(1) Arrangements to familiarize police, fire, and emergency response teams with the layout of the facility, properties of HW handled, places where employees would normally be working, entrances to roads inside the facility, and evacuation routes?	_____Yes	_____No(!)
(2) Agreements with police, & fire departments designating primary emergency authority?	_____Yes	_____No(!)
(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers?	_____Yes	_____No(!)
(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases?	_____Yes	_____No(!)
(b) Where State or local authorities decline to enter into such arrangements, has the owner/operator documented the refusal in his operating record?	_____Yes	_____No(!)

Contingency plans and emergency procedures 265 – Subpart D (GGR)

Purpose and implementation of contingency plan 265.51		
(a) Does Owner/operator have a contingency plan?	_____Yes	_____No(!)
(b) Are the provisions of the plan carried out immediately whenever there is a fire, explosion, or release of HW?	_____Yes	_____No(!)
Content of contingency plan 265.52		
(a) Does the plan describe emergency actions facility personnel must take in response to fires, explosions, or releases of HW?	_____Yes	_____No(!)
(b) If facility only has an SPCC plan, was it amended to comply with subpart C?	_____Yes	_____No(!)
(c) Does the plan describe arrangements agreed to by local police, fire depts, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	_____Yes	_____No(!)
(d) Does the plan have an updated list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators. (Where more than one person is listed, one must be designated as primary.)	_____Yes	_____No(!)
(e) Does the plan contain:		
• A list of all emergency equipment at the facility?	_____Yes	_____No(!)
• A brief description of the equipments abilities?	_____Yes	_____No(!)
• Location of the equipment at the facility?	_____Yes	_____No(!)
(f) Does the plan include an evacuation plan that includes the following:		
• A description of signals used to begin an evacuation?	_____Yes	_____No(!)
• Evacuation routes?	_____Yes	_____No(!)
• Alternate evacuation routes?	_____Yes	_____No(!)
Copies of the contingency plan 265.53		
(a) Is a copy of the plan maintained at the facility?	_____Yes	_____No(!)
(b) Is a copy submitted to all local police, fire depts, hospitals, and State and local emergency response teams that may be called upon for emergency services?	_____Yes	_____No(!)
Amendment of contingency plan 265.54		
Is the plan reviewed, and amended, whenever:		
(a) Regulations are revised?	_____Yes	_____No(!)
(b) The plan fails	_____Yes	_____No(!)
(c) The facility changes in its design or construction	_____Yes	_____No(!)
(d) The list of emergency coordinators changes	_____Yes	_____No(!)
(e) The list of emergency equipment changes	_____Yes	_____No(!)
Emergency Coordinator 265.55		
Is a qualified person on call at all times to act as emergency coordinator?	_____Yes	_____No(!)

Use and Management of Containers 265 – Subpart I (GGR)

Condition of containers 265.171 Does generator transfer waste from containers in poor condition into containers in good condition?	_____Yes	_____No(!)
Compatibility of waste with container 265.172 Are all containers compatible with the waste they contain?	_____Yes	_____No(!)
Management of containers 265.173 (a) Are containers closed except when adding or removing waste?	_____Yes	_____No(!)
(b) Are containers being handled in such a way as to prevent rupture or leaking?	_____Yes	_____No(!)
(c) Is each container marked with the following or equivalent statement: "Hazardous waste – federal laws prohibit improper disposal."	_____Yes	_____No(!)
(d) Is each container marked with an appropriate EPA waste number?	_____Yes	_____No(!)
Inspections 265.174 Are all areas where containers are stored being inspected at least weekly for leaks and deterioration caused by corrosion or other factors?	_____Yes	_____No(!)
Containment 265.175 For areas where wastes with free liquids are stored: (b)(1) Is there a base under containers which is free of cracks and gaps, and is sufficiently impervious to contains leaks of hazardous waste and accumulated precipitation?	_____Yes	_____No(!)
(Note:) Uncoated concrete may not be sufficiently impervious. Especially where corrosive wastes or solvents are stored. (2) Is the base sloped to remove spillage or accumulated precipitation?	_____Yes	_____No(!)
(Note:) Not required where containers are elevated to prevent contact with spillage or accumulated precipitation. (3) Does the containment system have sufficient volume to contain 10% of the volume of the containers or 100% of the volume of the largest container?	_____Yes	_____No(!)
(4) Is runon prevented, unless there is sufficient excess capacity?	_____Yes	_____No(!)
(5) Is spilled or leaked waste and precipitation removed in a timely manner? For areas where wastes without free liquids are stored: (c)(1) Is the storage area sloped or otherwise designed and operated to remove precipitation or other liquids?	_____Yes	_____No(!)
(2) Are containers elevated to prevent contact with accumulated liquid?	_____Yes	_____No(!)
(d) Are wastes with the following waste numbers provided with secondary containment as required by paragraph (b) of this section: (1) F020, F021, F022, F023, F026, & F027?	_____Yes	_____No(!)

Tank Systems 265 – subpart J (GGR)

Design and installation of new tank systems 265.192		
(a) Has the owner/operator ensured that all components of the tank system are adequately designed to prevent failure of the tank by obtaining a written assessment of the tank by an independent registered professional engineer attesting that the system is acceptable for the storage of hazardous waste?	_____Yes	_____No(!)
Does this assessment include:		
(1) Design standards for which the tanks and ancillary equipment will be constructed?	_____Yes	_____No(!)
(2) Hazardous characteristics of the waste to be handled?	_____Yes	_____No(!)
(Note) – different tanks designs have different regulatory requirements. This checklist addresses only above ground HW storage tanks.		
Containment and detection of releases 265.193		
(a) Does tanks system have secondary containment system?	_____Yes	_____No(!)
(b)(1) Is the system designed, installed, and operated to prevent migration of waste and accumulated liquid to the soil, groundwater, or surface water?	_____Yes	_____No(!)
(2) Is it capable of detecting and collecting releases and accumulated liquids until they can be removed?	_____Yes	_____No(!)
(c)(1) Is the containment system constructed of or lined with materials that have sufficient strength and thickness to prevent failure due to pressure gradients(including static head and external hydrological forces), physical contact with the waste, climactic conditions, stress of installation, and stress of daily operation including vehicular traffic?	_____Yes	_____No(!)
(2) Placed on a foundation capable of supporting the system?	_____Yes	_____No(!)
(3) Provided with a leak detection system capable of detecting releases within 24 hours?	_____Yes	_____No(!)
(4) Sloped or otherwise designed to allow for the collection of liquids?	_____Yes	_____No(!)
(d) Does the secondary containment system include one or more of the following?	_____Yes	_____No(!)
(1) A liner which is external to the tank?	_____Yes	_____No(!)
(2) A vault	_____Yes	_____No(!)
(3) A double walled tank	_____Yes	_____No(!)
(4) An equivalent device approved by the Department?	_____Yes	_____No(!)
External liners		
(e)(1) Is any external liner designed and operated as follows: (i) is it designed to contain 100% of the capacity of the largest tank within its boundary?	_____Yes	_____No(!)
(ii) Designed and operated to prevent run-on of precipitation from a 25 year, 24 hour rainfall event?	_____Yes	_____No(!)
(iii) Is it free of cracks and gaps?	_____Yes	_____No(!)
(iv) Is it designed and operated to completely surround the tank and cove all surrounding earth likely to come in contact with waste from a release?	_____Yes	_____No(!)

Vault systems		
(e)(2) Is any vault system designed and operated as follows:		
(i) Is it designed to contain 100% of the capacity of the largest tank within its boundary?	_____Yes	_____No(!)
(ii) Designed and operated to prevent run-on of precipitation from a 25 year, 24 hour rainfall event?	_____Yes	_____No(!)
(iii) Constructed with chemically resistant water stops?	_____Yes	_____No(!)
(iv) Provided with an impermeable interior coating which is compatible with the stored waste to prevent migration into the concrete?	_____Yes	_____No(!)
(v) Provided with a means to protect against the formation of and ignition of vapors from ignitable and reactive wastes?	_____Yes	_____No(!)
(vi) Provided with an exterior moisture barrier?	_____Yes	_____No(!)
Double walled tanks		
(e)(3) Is any double walled tank designed and operated as follows:		
(i) Designed as an integral structure so that any release from the inner tank is contained by the outer shell?	_____Yes	_____No(!)
(ii) Protected from corrosion?	_____Yes	_____No(!)
(iii) Provided with built in, continuous leak detection capable of detecting leaks within 24 hours?	_____Yes	_____No(!)
Ancillary equipment		
(f) Is any ancillary equipment provided with full secondary containment?	_____Yes	_____No(!)
The following are exempt from the secondary containment requirements:		
(1) Aboveground piping that is visually inspected on a daily basis for leaks. (flanges, joints, valves, & connections are not exempt and require containment)	_____Yes	_____No(!)
(2) Welded flanges, welded joints, and welded connections visually inspected on a daily basis for leaks	_____Yes	_____No(!)
(3) Seal-less or magnetic coupling pumps and seal-less valve that are inspected on a daily basis for leaks	_____Yes	_____No(!)
(4) Pressurized aboveground piping systems with automatic shutoff devices that are inspected on a daily basis for leaks	_____Yes	_____No(!)
General operating requirements 265.194		
(a) Are hazardous wastes or treatment reagents placed in tank which could cause tank system to rupture, leak, corrode, or otherwise fail?	_____Yes	_____No(!)
(b) Does owner/operator use appropriate controls and practices to prevent spills& overflows?	_____Yes	_____No(!)
Inspections 265.195		
(a) Does the owner/operator inspecting at least daily, the following equipment:		
(1) Overflow/spill control equipment?	_____Yes	_____No(!)
(2) All above ground portions of the tank to detect releases?	_____Yes	_____No(!)
(3) Data from monitoring equipment and leak detection equipment?	_____Yes	_____No(!)
(4) The tank and secondary containment for signs of erosion and or releases?	_____Yes	_____No(!)
(c) Are the inspections being documented?	_____Yes	_____No(!)

Response to leaks or spills and disposition of leaking or unfit-for-use tanks 265.196		
Has owner/operator's tank ever leaked or otherwise been determined to be un-fit-for use?	_____Yes	_____No(!)
If yes, were the following requirements met?		
(a) Did owner/operator immediately stop using the tank & inspect for cause of leak?	_____Yes	_____No(!)
(b)(1) Was all waste removed from tank within 24 hours?	_____Yes	_____No(!)
(2) Was all waste removed from secondary containment within 24 hours?	_____Yes	_____No(!)
(c)(1) Were steps taken to prevent further migration of the waste to soil or surface water	_____Yes	_____No(!)
(2) Were any visible contaminants removed and properly disposed of from soil or surface water?	_____Yes	_____No(!)
(d)(1) Was the Department notified of the release within 24 hours?	_____Yes	_____No(!)
(3) Was a written report submitted to the Department within 30 days?	_____Yes	_____No(!)
Closure and post-closure care 265.197		
(a)At closure, did the owner/operator remove or decontaminate all components and manage them as hazardous waste per the facility's closure plans as required in subparts G & H of this part?	_____Yes	_____No(!)
(b) If all contaminated soils cannot be practicably removed, did the owner /operator close his tank unit as if it were a landfill?	_____Yes	_____No(!)
Special requirements for ignitable or reactive waste 265.198		
(a)(1)(i) Were ignitable or reactive wastes treated, rendered, or mixed before or immediately after placement in the tanks such that the waste was no longer ignitable or reactive?	_____Yes	_____No(!)
(2) Were these wastes stored in such a way to prevent ignition or reaction?	_____Yes	_____No(!)
(b) Are the appropriate protective distances from property lines being maintained?	_____Yes	_____No(!)
Special requirements for incompatible wastes 265.199		
(a) Are incompatible wastes being placed in the same tank?	_____Yes	_____No(!)
(b) Are hazardous wastes being placed in tanks that have not been properly decontaminated which previously held incompatible waste?	_____Yes	_____No(!)
Waste analysis and trial tests 265.200		
(a) Does owner/operator, when treating or storing a hazardous waste that is substantially different from a previously treated waste, conduct waste analysis and trial treatment or storage tests?	_____Yes	_____No(!)
(b) Are these tests documented?	_____Yes	_____No(!)

Drip pads for wood treaters 265 – Subpart W (GOR)

Assessment of existing drip pad integrity 265.441		
(a)Has the company evaluated its existing drip pad(s)?	_____Yes	_____No(!)
• Was it reviewed and certified by an independent, registered, professional engineer?	_____Yes	_____No(!)
• Is the evaluation on file?	_____Yes	_____No(!)
• Was the evaluation written no later than June 6, 1991?	_____Yes	_____No(!)
• Does the evaluation properly address application aspects of 265.443?	_____Yes	_____No(!)
• Is the age of the drip pad documented in this evaluation?	_____Yes	_____No(!)
• Is the evaluation reviewed, updated and re-certified annually?	_____Yes _____Yes	_____No(!) _____No(!)
• Does the existing drip pad meet the requirements of 265.443(b)	_____Yes	_____No(!)
(b) Has the owner or operator developed a written plan for upgrading, repairing, and modifying the drip pad to meet the requirements of 265.443(b)?	_____Yes	_____No(!)
• Was it submitted to the Department no later than 2 years before the date that the upgrades were completed?	_____Yes	_____No(!)
• Has the plan been reviewed and certified by an independent, qualified, registered professional engineer?	_____Yes	_____No(!)
(c) Upon completion of upgrades, were as-built drawings submitted to the Department?	_____Yes	_____No(!)
(d) If the drip pad was found to be leaking, did the owner or operator comply with 265.443(m) of close the drip pad?	_____Yes	_____No(!)
Design and operating requirements 265.443		
(a)(1) Are all drip pads constructed of non-earthen materials excluding wood and non-structurally supported asphalt?	_____Yes	_____No(!)
(2) Are they sloped for drainage?	_____Yes	_____No(!)
(3) Are they curbed or have a berm around perimeter?	_____Yes	_____No(!)
(4) Impermeable across entire surface?	_____Yes	_____No(!)
(5) Do they have sufficient structural strength and thickness?	_____Yes	_____No(!)
(b)(1) Does drip pad have an appropriately constructed and installed synthetic liner?	_____Yes	_____No(!)
(2) Does drip pad have an appropriately designed, constructed, and maintained leak detection system?	_____Yes(!)	_____No
(c) Does the pad have any cracks, caps, corrosion, or other evidence of deterioration?	_____Yes(!)	_____No
(d) Has any drippage, liquids from precipitation, or other waste run off of the pad and/ or collection system?	_____Yes	_____No(!)
(e)& (f) Unless the pad and collection system are covered, is it designed and constructed to prevent run-on and run-off from a 24 hour, 25year storm event from co-mingling?	_____Yes	_____No(!)
(g) Has the drip pad been evaluated properly to ensure it satisfies the requirements above?	_____Yes	_____No(!)
(h) Unless the pad and collection system are covered, are measures taken to remove drippage and accumulation of precipitation to prevent overflow?		

(i) Is the surface of the drip pad cleaned at lease once every seven days and is this cleaning documented?	_____Yes	_____No(!)
(j) Is drippage or other hazardous waste tracked off of drip pad as a result of usual activities?	_____Yes(!)	_____No
(k) Is treated wood left on drip pad until all drippage has ceased?	_____Yes	_____No(!)
(l) Is collection system drained ASAP after storm events?	_____Yes	_____No(!)
(m)(1) If owner or operator detects a condition that may have caused a release of hazardous waste, was it repaired?	_____Yes	_____No(!)
(i) Was the condition recorded in facility operating log?	_____Yes	_____No(!)
(ii) Was the drip pad immediately taken out of service?	_____Yes	_____No(!)
(iii) Were repair steps taken, leakage remediated, and a clean-up and repair schedule developed?	_____Yes	_____No(!)
(iv) Was the Department notified within 24 hours of discovery and provided a written notice of remediation plan within 10 days of discovery?	_____Yes	_____No(!)
(3) Was the Department provided with a certification from an independent, qualified, registered professional engineer that remediations were accomplished?	_____Yes	_____No(!)
<u>Inspections</u> 265.444		
(a) During construction or installation have liners and cover systems been inspected for:		
• Uniformity	_____Yes	_____No(!)
• Damage?	_____Yes	_____No(!)
• Imperfections?	_____Yes	_____No(!)
• Have liners been certified to be in compliance with 265.443 by a PE?	_____Yes	_____No(!)
• To ensure tight seems and joints?	_____Yes	_____No(!)
• For tears?	_____Yes	_____No(!)
• For punctures?	_____Yes	_____No(!)
• For blisters?	_____Yes	_____No(!)
(b) While in operation, has it been inspected for:		
(1) Deterioration of run-on and run-off control systems?	_____Yes	_____No(!)
(2) Leakage?	_____Yes	_____No(!)
(3)Deterioration or cracking of drip pad surfaces?	_____Yes	_____No(!)
<u>Closure</u> 265.445		
(a) At closure of a drip pad, did owner or operator remove or decontaminate all waste residues, system components, contaminated soils and structures and equipment contaminated with waste and manage them as Hazardous waste?	_____Yes	_____No(!)
(b) If owner or operator finds that after making reasonable efforts to decontaminate applicable parts of drip pad were practical or successful, was unit closed as if it were a landfill?	_____Yes	_____No(!)
(c) For existing drip pads without liners, did the owner or operator:		
(i) include in the closure plan provisions for complying with both paragraphs (a) & (b) of this section?	_____Yes	_____No(!)
(ii) prepare a contingent post-closure plan to comply with paragraph	_____Yes	_____No(!)
(b) of this section if all contaminated soils cannot be removed?	_____Yes	_____No(!)

Containment Buildings 265 –Subpart DD (GOR)

Design and operating standards 265.1101		
(a)(1) Is the building completely enclosed with a floor, walls and roof to prevent exposure of the waste to the elements?	_____Yes	_____No(!)
(2) Are the floor and walls designed and constructed of materials with sufficient strength to support themselves, the weight of any waste, personnel,& heavy equipment?	_____Yes	_____No(!)
(i) Is the building provided with an effective barrier to prevent fugitive dust emissions?	_____Yes	_____No(!)
(3) Are incompatible wastes or treatment reagents being stored in the same building?	_____Yes(!)	_____No
(4) Is there a primary barrier designed to withstand the movement of personnel, & waste handling equipment and is it appropriate for the physical and chemical characteristics of the waste to be managed?	_____Yes	_____No(!)
(b) For building to manage waste with free liquids:		
(1) Is the primary barrier designed and constructed of material to prevent migration of waste into the barrier? (e.g. a geomembrane covered by a concrete wear surface)	_____Yes	_____No(!)
(2) Is there a liquid collection and removal system?	_____Yes	_____No(!)
(3) Is there a secondary containment system?	_____Yes	_____No(!)
(c) For all containment buildings:		
(1) (i) does the owner / operator maintain the primary barrier to be free of cracks, gaps, corrosion or other deterioration?	_____Yes	_____No(!)
(ii) Ensure that the height of waste in building does not exceed height of walls?	_____Yes	_____No(!)
(iii) Take measures to prevent tracking of waste from the building and designate an area for personnel and equipment decon?	_____Yes	_____No(!)
(iv) Take measures to control fugitive dust?	_____Yes	_____No(!)
(2) Does the owner / operator have a certification for a PE stating that the buildings design is adequate?	_____Yes	_____No(!)
(3) Upon detection of release, did the owner / operator:		
(A) Enter a record of the discovery into the facility operating log?	_____Yes	_____No(!)
(B) Remove the affected portion of the building from service?	_____Yes	_____No(!)
(C) Establish a schedule for repair?	_____Yes	_____No(!)
(D) Notify the Department within 7 days of the discovery and within 14 days provide the Department with written notice of the steps taken to repair?	_____Yes	_____No(!)
(4) Is data from leak detection and monitoring equipment inspected and recorded at least every 7 days?	_____Yes	_____No(!)

Land Disposal Restrictions 268 – Subpart A (GLB)

Testing, tracking, and recordkeeping requirements for generators 268.7		
(a) (1) Did the generator determine if his waste had to be treated prior to land disposal?	_____Yes	_____No(!)
(2) If the waste or contaminated soil does not meet a treatment standard, did the generator send a one-time notification to the TSDF that included the following information:	_____Yes	_____No(!)
• Epa hazardous waste number & manifest document number	_____Yes	_____No(!)
• A statement that the waste is prohibited from land disposal	_____Yes	_____No(!)
• Applicable wastewater/non-wastewater category	_____Yes	_____No(!)
• Waste analysis data (when available)	_____Yes	_____No(!)
• For hazardous debris, when treated with the alternate standards: the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45.	_____Yes	_____No(!)
• For contaminated soil, the following statement, "this contaminated soil (does/does not) contain listed waste and (does/does not) exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided by 268.49(c) or the universal treatment standards.	_____Yes	_____No(!)
(3) If the waste or contaminated soil meets the treatment standard at the original point of generation: Did the generator send a one-time notification to the TSDF that included the following information"		
• Epa hazardous waste number & manifest document number	_____Yes	_____No(!)
• A statement that the waste is prohibited from land disposal	_____Yes	_____No(!)
• Applicable wastewater/non-wastewater category	_____Yes	_____No(!)
• Waste analysis data (when available)	_____Yes	_____No(!)
• For contaminated soil, the following statement, "this contaminated soil (does/does not) contain listed waste and (does/does not) exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided by 268.49(c) or the universal treatment standards.	_____Yes	_____No(!)
• The, "penalty of law" statement.	_____Yes	_____No(!)
(4) If the waste is subject to an exemption from LDR treatment standards the generator send the TSDF a one-time notification that included:		
• Epa hazardous waste number & manifest document number	_____Yes	_____No(!)
• A statement that the waste is not prohibited from land disposal	_____Yes	_____No(!)
• Waste analysis data (when available)	_____Yes	_____No(!)
• The date the waste was subject to the prohibition	_____Yes	_____No(!)
• For hazardous debris, when treated with the alternate standards: the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45.	_____Yes	_____No(!)

(5) If the generator is treating prohibited waste in tanks, containers, or containment buildings, does he have a waste analysis plan?	_____Yes	_____No(!)
(6) If generator uses knowledge of process or testing to determine if his waste is restricted from land disposal did he retain all records onsite?	_____Yes	_____No(!)
(7) If generator determines he is managing a prohibited waste that is excluded did he place a non-time notification in his on-site records?	_____Yes	_____No(!)
(8) Did generator retain all records associated with LDR for a period of three years?	_____Yes	_____No(!)
(9)(i) If the generator is managing lab packs and wishes to use the alternate treatment standards for lab packs did he send the TSDF a one-time notification that included:	_____Yes	_____No(!)
• Epa hazardous waste number & manifest document number	_____Yes	_____No(!)
• The, “penalty of law” statement.	_____Yes	_____No(!)

(!) indicates the possibility of non-compliance.

Compliance Monitoring Inspection Checklist
For
Universal Waste Handlers

South Carolina Department of
Health and Environmental Control

Bureau of Land and Waste Management

Division of Compliance and Enforcement

October 1, 2003

Table of contents

Applicability:

What universal waste is/are managed? (Check any that apply)

Batteries _____

Pesticides_____

Thermostats _____

Lamps_____

Which type of universal waste handler is the facility? (Check any that apply)

Small quantity_____

Large quantity_____

Transfer facility_____

Transporter_____

Destination facility_____

Small quantity handlers (GOR)

Definition: Small quantity handler: one who does not accumulate more than 5,000 kg of universal waste at one time.

(a) Has handler disposed of universal waste?	_____Yes	_____No
(b) Has handler diluted universal waste?	_____Yes	_____No
Batteries: 273.13		
(a) Has handler handled universal waste batteries in such a way to prevent releases to the environment?	_____Yes	_____No(!)
(a)(1)Has the handler contained any universal waste batteries that show evidence of leakage or damage in a compatible /closed container?	_____Yes	_____No(!)

(2) Has the handler conducted any of the following activities?		
(i) Sorting batteries by type	_____Yes	_____No(!)
(ii) Mixing by type in one container	_____Yes	_____No(!)
(iii) Discharging energy	_____Yes	_____No(!)
(iv) Regenerating used batteries	_____Yes	_____No(!)
(v) Disassembling batteries or packs into individual cells	_____Yes	_____No(!)
(vi) Removing batteries from consumer products	_____Yes	_____No(!)
(vii) Removing electrolytes from batteries	_____Yes	_____No(!)
Note: another activities may require waste determination or permit.		
(3) Has handler determined if material resulting from processing of the batteries or from releases is hazardous waste, and if so, has handler managed the material as a hazardous waste?	_____Yes	_____No(!)
Pesticides:		
(b) Are universal waste pesticides being managed in such a way to prevent releases to the environment?	_____Yes	_____No(!)
(1) Are universal waste pesticides being managed in containers that are compatible/closed?	_____Yes	_____No(!)
(2) Are damaged containers over-packed if necessary?	_____Yes	_____No(!)
(3) If a tank is used to manage universal waste pesticides, does it comply with subpart J?	_____Yes	_____No(!)
(4) If transport vehicles are being used to manage universal, are they compatible/closed?	_____Yes	_____No(!)
Thermostats:		
(c) Has the handler managed universal waste thermostats in such a way to prevent releases to the environment?	_____Yes	_____No(!)
(1) Does the handler use compatible/closed containers?	_____Yes	_____No(!)

(2) Has the handler removed mercury containing ampules from universal waste thermostats in one of the following ways:	_____Yes	_____No(!)
(i) Remove ampules in such a way to prevent breakage?	_____Yes	_____No(!)
(ii) Remove ampules over containment device (e.g., tray or pan)	_____Yes	_____No(!)
(iii) Ensure that mercury clean-up system is available & that spills and releases are transferred to a container the meets subpart I requirements?	_____Yes	_____No(!)
(v) Ensure the area where ampules are removed is well ventilated and meets OSHA exposure limits for mercury.	_____Yes	_____No(!)
(vi) Ensure that employees removing ampules are thoroughly familiar with proper waste handling and emergency procedures.	_____Yes	_____No(!)
(vii) Stores removed ampules in closed, non-leaking containers in good condition.	_____Yes	_____No(!)
(viii) Packs removed ampules in container with adequate packing material to prevent breakage.	_____Yes	_____No(!)
(3) Has the handler determined that material generated from separating ampules from thermostats exhibits the characteristics of hazardous waste?	_____Yes	_____No(!)
Lamps:		
(d) Has handler managed lamps in such a way to prevent releases of any universal waste to the environment?	_____Yes	_____No(!)
(1) Are universal waste lamps managed in containers that are closed, structurally sound, adequate to prevent breakage, and compatible with the contents?	_____Yes	_____No(!)
(2) Are broken lamps immediately cleaned up and placed in containers that are closed, structurally sound, adequate to prevent breakage, and compatible with the contents?	_____Yes	_____No(!)

Labeling – Batteries, pesticides, thermostats & Lamps: 273.13		
Has the handler ensured that universal wastes are labeled/marked with one of the following:	_____Yes	_____No(!)
(a) For batteries; “universal waste – battery(ies),” or “waste battery(ies),” or “used battery(ies).”	_____Yes	_____No(!)
(b) For pesticides; The original manufacturers product label, or “universal waste-pesticide(s)”, or “waste pesticide(s).”	_____Yes	_____No(!)
(d) For thermostats; “universal waste-mercury thermostat(s)”, or “waste mercury thermostat(s)”, or “used mercury thermostat(s)”.	_____Yes	_____No(!)
(e) For lamps; “universal waste-lamp(s)”, or waste lamp(s)”, or “used lamp(s)”.	_____Yes	_____No(!)
Accumulation time limits: 273.15		
(a) Has the handler accumulated universal wastes for longer than one year?	_____Yes	_____No(!)
(b) If wastes were accumulated longer than one year, was it for the purpose of accumulating sufficient quantities to facilitate proper recovery, treatment, or disposal?	_____Yes	_____No(!)
(c) Is the handler able to demonstrate the length of time universal wastes have been accumulated?	_____Yes	_____No(!)
Which of the following methods in used?		
(1) Is waste placed in containers marked with earliest date universal waste was placed in container?	_____Yes	_____No(!)
(2) Is each individual item labeled with a date?	_____Yes	_____No(!)
(3) Is an inventory system that ID’s the date of each universal waste?	_____Yes	_____No(!)
(4) Is an inventory system that ID’s the earliest date any universal waste in a group of universal waste items or a group of containers became a waste?	_____Yes	_____No(!)
(5) Is waste placed in a specific accumulation area identifying the earliest date that any universal waste in the area became a waste?	_____Yes	_____No(!)

(6) Is any other method that clearly demonstrates the length or time that universal wastes have been accumulated?	_____Yes	_____No(!)
Employee training: 273.16 Has the handler informed all employees who handle universal waste of proper handling and emergency procedures?	_____Yes	_____No(!)
Off site shipments: 273.18 Has handler sent universal waste to only another universal waste handler, destination facility, or a foreign destination? List name/USEPA ID # of facilities receiving waste: _____ _____ _____ _____	_____Yes(!)	_____No
(b) Has handler transported his own universal waste? If so he becomes subject to the transporter requirements of Subpart D.	_____Yes	_____No
(c) Does handler comply with USDOT shipping requirements?	_____Yes	_____No(!)
(d) Does handler ensure that receiving facility agrees to accept shipment? **Note**: Small quantity handlers are not required to keep records of shipments of universal waste.	_____Yes	_____No(!)

Large Quantity Handlers (GOR)

Definition: A large quantity handler of universal waste is one who accumulates more than 5000Kg. Total of universal waste in a calendar year.		
Prohibitions: 273.31		
(a) Has handler disposed of universal waste?	_____Yes(!)	_____No
(b) Has handler diluted universal waste?	_____Yes(!)	_____No
Notification requirements: 273.32		
(a)(1) Has large quantity handler notified the Department of its universal waste activity using DHEC form 2701?	_____Yes	_____No(!)
Waste management: 273.33		
Batteries:		
(a) Has handler handled universal waste batteries in such a way to prevent releases to the environment?	_____Yes	_____No(!)
(a)(1)Has the handler contained any universal waste batteries that show evidence of leakage or damage in a compatible /closed container?	_____Yes	_____No(!)
(2) Has the handler conducted any of the following activities:		
(i) Sorting batteries by type	_____Yes	_____No(!)
(ii) Mixing by type in one container	_____Yes	_____No(!)
(iii) Discharging energy	_____Yes	_____No(!)
(iv) Regenerating used batteries	_____Yes	_____No(!)
(v) Disassembling batteries or packs into individual cells	_____Yes	_____No(!)
(vi) Removing batteries from consumer products	_____Yes	_____No(!)
(vii) Removing electrolytes from batteries	_____Yes	_____No(!)
Note: another activity may require waste determination or permit.		
(3) Has handler determined if material resulting from processing of the batteries or from releases is hazardous waste, and if so, has handler managed the material as a hazardous waste?	_____Yes	_____No(!)

Pesticides:		
(b) Are universal waste pesticides being managed in such a way to prevent releases to the environment?	_____Yes	_____No(!)
(1) Are universal waste pesticides being managed in containers that are compatible/closed?	_____Yes	_____No(!)
(2) Are damaged containers over-packed if necessary?	_____Yes	_____No(!)
(3) If a tank is used to manage universal waste pesticides, does it comply with subpart J?	_____Yes	_____No(!)
(4) If transport vehicles are being used to manage universal, are they compatible/closed?	_____Yes	_____No(!)
Thermostats:		
(c) Has the handler managed universal waste thermostats in such a way to prevent releases to the environment?	_____Yes	_____No(!)
(1) Does the handler use compatible/closed containers?	_____Yes	_____No(!)
(2) Has the handler removed mercury containing ampules from universal waste thermostats in one of the following ways:	_____Yes	_____No(!)
(i) Remove ampules in such a way to prevent breakage?	_____Yes	_____No(!)
(ii) Remove ampules over containment device (e.g., tray or pan)	_____Yes	_____No(!)
(iii) Ensure that mercury clean-up system is available & that spills and releases are transferred to a container the meets subpart I requirements?	_____Yes	_____No(!)
(v) Ensure the area where ampules are removed is well ventilated and meets OSHA exposure limits for mercury.	_____Yes	_____No(!)
(vi) Ensure that employees removing ampules are thoroughly familiar with proper waste handling and emergency procedures.	_____Yes	_____No(!)
(vii) Stores removed ampules in closed, non-leaking containers in good condition.	_____Yes	_____No(!)
(viii) Packs removed ampules in container with adequate packing material to prevent breakage.	_____Yes	_____No(!)
(3) Has the handler determined that material generated from separating ampules from thermostats exhibits the characteristics of hazardous waste?	____Yes	_____No(!)

Lamps:		
(d) Has handler managed lamps in such a way to prevent releases of any universal waste to the environment?	_____Yes	_____No(!)
(1) Are universal waste lamps managed in containers that are closed, structurally sound, adequate to prevent breakage, and compatible with the contents?	_____Yes	_____No(!)
(2) Are broken lamps immediately cleaned up and placed in containers that are closed, structurally sound, adequate to prevent breakage, and compatible with the contents?	_____Yes	_____No(!)
Labeling - Batteries, pesticides, thermostats & Lamps: 273.34		
Has the handler ensured that universal wastes are labeled/marked with one of the following:		
(a) For batteries; "universal waste - battery(ies)," or "waste battery(ies)," or "used battery(ies)."	_____Yes	_____No(!)
(b)For pesticides; The original manufacturers product label, or "universal waste-pesticide(s)", or "waste pesticide(s)."	_____Yes	_____No(!)
(d)For thermostats; "universal waste-mercury thermostat(s)", or "waste mercury thermostat(s)", or "used mercury thermostat(s)".	_____Yes	_____No(!)
(e)For lamps; "universal waste-lamp(s)", or waste lamp(s)", or "used lamp(s)".	_____Yes	_____No(!)
Accumulation time limits: 273.35		
(a) Has the handler accumulated universal wastes for longer than one year?	_____Yes(!)	_____No
(b) If wastes were accumulated longer than one year, was it for the purpose of of accumulating sufficient quantities to facilitate proper recovery, treatment, or disposal?	_____Yes	_____No(!)
(c) Is the handler able to demonstrate the length of time universal wastes have been accumulated?	_____Yes	_____No(!)
Which of the following methods in used?		
(1) Is waste placed in containers marked with earliest date universal waste was placed in container?	_____Yes	_____No(!)

(2) Is each individual item labeled with a date?	_____Yes	_____No(!)
(3) Is an inventory system that ID's the date of each universal waste?	_____Yes	_____No(!)
(4) Is an inventory system that ID's the earliest date any universal waste in a group of universal waste items or a group of containers became a waste?	_____Yes	_____No(!)
(5) Is waste placed in a specific accumulation area identifying the earliest date that any universal waste in the area became a waste?	_____Yes	_____No(!)
(6) Is any other method that clearly demonstrates the length or time that universal wastes have been accumulated?	_____Yes	_____No(!)
Employee training: 273.36		
Has the handler informed all employees who handle universal waste of proper handling and emergency procedures?	_____Yes	_____No(!)
Off site shipments: 273.38		
Has handler sent universal waste to only another universal waste handler, destination facility, or a foreign destination?	_____Yes	_____No(!)
List name/USEPA ID # of facilities receiving: waste:		
_____		
_____		
_____		
_____		
_____		
(b) Has handler transported his own universal waste?	_____Yes	_____No
If so he becomes subject to the transporter requirements of Subpart D.		
(c) Does handler comply with USDOT shipping requirements?	_____Yes	_____No(!)
(d) Does handler ensure that receiving facility agrees to accept shipment?	_____Yes	_____No(!)

Tracking universal waste shipments: 273.39 (a) Receipt of shipments: Does handler track each shipment of Universal waste showing the name/address of the originator, quantity of waste received, and the date of receipt?	_____Yes	_____No(!)
(b) Off-site shipments: Does handler keep a record of each shipment sent which includes name/address of handler, destination facility: the quantity and type of each universal waste sent: the date the shipment was sent?	_____Yes	_____No(!)
(c) Does handler retain these records for at least three years?	_____Yes	_____No(!)

Universal waste Transporters 273.51 (TOR)

(a) Has universal waste transporter disposed of universal waste?	_____Yes	_____No
(b) Has transporter diluted or treated universal waste?	_____Yes	_____No
Waste Management 273.52 (a) Has transporter complied with all applicable USDOT regulations in 49 CFR part 171-180?	_____Yes	_____No(!)
Storage Time Limits 273.53 (a) Has transporter stored hazardous waste at a transfer facility for greater than 10 days?	_____Yes(!)	_____No
If yes, does transporter comply with applicable small or large quantity handler requirements?	_____Yes	_____No(!)
Response to releases 272.54 (a) Has transporter responded immediately to contain all releases?	_____Yes	_____No(!)
(b) Has transporter determined if material resulting from releases is hazardous waste, and if so has the handler managed the material as hazardous waste?	_____Yes	_____No(!)

Off-site shipments 273.55 (a) Has transporter sent universal waste only to a place other than a universal waste handler, destination facility, or a foreign destination? **Exports** 273.56 For foreign shipments, has a copy of the EPA acknowledgement of consent accompanied the shipment?	_____Yes _____Yes	_____No(!) _____No(!)

Standards for destination facilities 273.60 (DOR)

(a) Is the destination facility operating in compliance with parts 264, 265, 266, 268, 270, & 124, and the notification requirements? (b) If destination facility recycles its universal waste without prior accumulation, has it: (261.6 (2)(i)-(iii) i. Notified the Department of it's activities using DHEC form 2701? ii. Complied with sections 265.71 and 265.73 dealing with the use of the manifest and manifest discrepancies? iii. Complied with subparts AA, BB, & CC if necessary? **Note**: The Department considers, "without prior accumulation" to mean that all wastes are processed or introduced into processing equipment within 8 hours of receipt. **Off-site shipments** 273.61 (a) Has destination facility sent universal waste only to another destination facility, universal waste handler? **Tracking universal waste shipments** 273.62 (a) Does facility track each shipment of universal waste received showing the name/address or the originator, quantity of waste received and date of receipt? (b) Does facility keep records for at least three years from the date shipment is received/sent off-site?	_____Yes _____Yes _____Yes _____Yes _____Yes _____Yes _____Yes	_____No(!) _____No(!) _____No(!) _____No(!) _____No(!) _____No(!)

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Record Keeping

It pays to be clear on what files you must keep (and for how long you must keep them) to be in compliance. These files need to be kept in an organized manner in a central location. After you know what files you are required to have you can decide what other information would also be of value to you and keep this as well. These records will protect you from legal and financial troubles down the road, give you valuable data on business performance, and be a resource in proving your "green record" to your customers and neighbors.

Some of the general things that you will need to keep in your records include, but are by no means limited to, the following:

- any critical communications with regulators (you may need to ask them to send you something in writing);
- permit applications;
- any required reports, such as records of hazardous waste determinations, shipment paperwork, emission calculations, annual air toxics inventory and etc.;
- copies of written responses to regulatory inspection citations;
- any facility identification numbers you may have been assigned such as generator identification numbers and etc.;
- spill response plans and associated documents;
- storm water pollution prevention plan; and
- employee training documents.

Any records of monitoring information that you keep needs to include the following:

- The date, exact place, and time of sampling or measurements;
- The initials or name(s) of the individual(s) who performed the sampling or measurements;
- The date(s) analyses were performed;
- The time(s) analyses were initiated;
- The initials or name(s) of the individual(s) who performed the analyses;
- References and written procedures, when available, for the analytical techniques or methods used; and
- The results of such analyses, including the bench sheets, instrument readouts, computer disks or tapes, etc., used to determine these results.

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Dealing with Spills

What are they?
A spill is an accidental release of a hazardous material to the environment. For example, three gallons of used oil that is spilled on an impermeable garage floor that ends up going down the floor drain which leads directly to a dry well must be reported, whereas the same three gallons, captured, contained and recovered before it can be released to the environment, does not need to be reported.

When is reporting required?
Any spill of petroleum that results in a release to the environment of 2 gallons or more must be reported as soon as possible to Emergency Response at 253-6488 in Columbia or toll free at 1-888-481-0125. Spills of hazardous materials must be reported where the environmental release poses a potential threat to health to the environment.

In the event of a spill:
- Contain the flow of material by using a bucket barrier, temporary dike, channels or other containment vessel to make cleanup and recovery easier. ***Don't let it enter floor drains.***
- Recover liquids for recycling if possible, otherwise properly dispose of them. One suggestion is to use an explosion-proof wet vac or squeegee to collect as much of the liquid as possible. This will minimize the amount of material that has to be placed in the hazardous waste drum. If you rely on absorbents, (speedi-dri, pads, "magic sorb", etc.) absorb as much as possible. Contaminated absorbents must be properly disposed of as hazardous waste.

Best Management Practices
Develop a basic spill prevention plan that addresses some of the following items:
- Involve employees as they may be the most knowledgeable regarding how and why spills sometimes occur.
- Maintain spill control and containment equipment in a designated area.
- Instruct employees on proper spill response procedures, including basic safety precautions like:
  - Minimize touching or walking in spilled material;
  - Minimize inhalation of any resulting gases, vapors or smoke;
  - Wash promptly if skin comes in contact with material.
- Post a list of emergency numbers next to the phone.
- Use drip trays, funnels or other means when transferring liquids.
- Use spring-loaded covers, valves or other positive shut-offs to prevent the accidental discharge of hazardous materials to floor drains.

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Reading a Material Safety Data Sheet

The Information provided in the table below should help you to understand how a Material Safety Data Sheet (MSDS) is formatted and what kind of information it contains. It is always a good idea to ask vendors for a copy of an MSDS for a chemical or product *before* actually purchasing the product. This will allow you to evaluate the product and compare it to others that perform a similar function. By doing this you can select the product or chemical that represents the least hazard to your employees and will result in the least amount of regulation.

What is This Stuff?	
Section I: Product Identity	Allows you to match the MSDS with the product.
Section II: Hazardous Ingredients	Names the hazardous ingredients and tells you the maximum amount you can be exposed to without harm.
How Does This Chemical Behave?	
Section III: Physical Data	Helps to figure out where to store the chemical and how likely it is to evaporate and give off vapors (leading to exposure and/or fires)
Is This Product Dangerous?	
Section IV: Fire and Explosion Data	Discusses when a chemical will ignite and how to extinguish the fire.
Section V: Reactivity Data	Tells you if the substance will explode or breakdown in the presence of sunlight or air.
Can This Product Hurt My Health?	
Section VI: Health Hazards Data	Tells you how the chemical can get into your body (e.g. absorbed through the skin, inhalation, etc.) Explains what the health effects may be if you are exposed and whether it can cause cancer. It also includes first aid procedures.
How Should I Work With This Stuff?	
Section VII: Precautions for Handling	What to do in case of a spill. How to dispose of waste.
How Should I Be Protected?	
Section VIII: Control Measures	Includes respirators, ventilation, eye protection, or special clothing.

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Environmental Management Systems

An Environmental Management System (EMS) is a set of processes and practices that enable an organization to reduce its environmental impacts and increase its operating efficiency. The goal of an EMS is to incorporate environmental considerations into your day-to-day operations. An EMS helps your facility address your environmental regulatory responsibilities and non-regulated environmental aspects such as energy efficiency and resource conservation. This tool employs a comprehensive approach to management that can also help you streamline operations and processes – allowing you to meet business goals such as work practices, employee training, record management, emergency preparedness, creating more efficient organizational structures, and continually improving your business.

An environmental management plan doesn't only help the environment. It is also a powerful tool that can help your business become more efficient and effective. *An* ***EMS can help you: save money, become more competitive, boost your public image, retain valuable employees, better manage environmental legal obligations, and improve your environmental performance.***

An EMS provides a systematic approach to environmental management that can reveal many opportunities for improving efficiency. Cutting waste, preventing pollution, and conserving resources all can help your company save money. For example, some areas where your facility may be able to save money are:

- starting a recycling program may enable you to reduce regulatory exposure, possibly reducing the need for permits, manifests, monitoring and reporting;
- you may be able to reduce your energy consumption and therefore see a corresponding reduction in your electricity bill;
- through materials substitution you may reduce your production of hazardous waste, reducing disposal costs and the time employees spend dealing with disposal and disposal requirements;
- you may be able to find a market for your facility's waste(s), this may not only reduce your disposal costs but bring in extra money as well;
- the structure of an EMS helps ensure that you identify and meet all environmental legal requirements, in the short term this allows you to avoid costly violations (no fines or legal fees) and may help you make wise decisions in the long run about the timing and size of investments needed to comply with future regulations.

The money you save with your EMS can be used to help you grow your business, boost shareholder earnings, or reward employees. At a more basic level, having an EMS can help you secure access to various markets. Some industries, such as automobile manufacturing, are requiring their suppliers to meet certain codes of environmental conduct or even to be certified under the international EMS standard, ISO 14001. There is a clear trend—companies that have strategies for environmental performance have a real advantage in an increasingly competitive market. An EMS allows your company to measure its progress against goals and allows you to proactively report results. This can help build up public trust and creditability. This type of transparency can affect investor decisions. Many financial analysts are paying increasing amounts of attention to environmental management.

Other benefits of an EMS are improvements in health and safety conditions at your facility. This can help improve employ-

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Environmental Management Systems

ee morale, pride, and overall job satisfaction. This may help you retain your current employees (and even possibly boost their effectiveness) as well as being helpful when you to recruit new employees.

An EMS makes good sense for both the environment and your business. Starting an EMS may not be as difficult as you think. Keep in mind that you don't have to do everything at once and that you may have some components of an EMS already in place. An EMS will lead you to assess where you are, where you want to go, and what issues are important for your operation.

If you would like help, a variety of resources may be useful, these include: local colleges, trade associations, other industry members (especially those in the South Carolina Environmental Excellence Program), private consultants, DHEC's Center for Waste Minimization, DHEC's Small Business Assistance Program, and the South Carolina Business Recycling Assistance Program.